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September 8, 2023

VIA ELECTRONIC MAIL AND ECF

Honorable Martin Glenn
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Courtroom 523
New York, NY 10004-1408

Re: *In re Wythe Berry Fee Owner LLC*, Case No. 22-11340 (MG)

Dear Judge Glenn:

We represent Wythe Berry Fee Owner LLC, as debtor and debtor-in-possession in the above-referenced chapter 11 case (the “Chapter 11 Case”). With the Court’s permission, given at the hearing in the Chapter 11 Case on August 30, 2023, we write to provide the Court with additional, clarifying information about Herrick, Feinstein LLP’s interim fee application [ECF No. 155] and compliance with the guidelines set forth in *In re Mesa Air Grp., Inc.*, Case No. 10-10018 (MG) (Bankr. S.D.N.Y. May 25, 2011).

As the Court noted at the hearing, Herrick’s interim fee application reflects that a total of 141.7 hours, amounting to \$101,329.00, was billed to the following task code: Fee/Employment Applications – B160 (“Task Code B160”). As the Court explained, whether it uses the \$969,749.00 total fees incurred or the \$837,749.00 post-reduction total in Herrick’s interim fee application to calculate compliance with the *Mesa* guidelines, this figure exceeds the 3–5% fee-cap range and therefore does not comply with the *Mesa* guidelines.

The Court permitted Herrick to clarify what percentage, if any, of time billed to Task Code B160 went toward retention applications, which can be isolated from time billed toward preparing fee applications for purposes of calculating compliance with the *Mesa* guidelines.

After the hearing, Herrick analyzed the Detailed Time Records at Exhibit C of its interim fee application, and grouped entries billed to Task Code B160 into categories of (i) retention application work and (ii) fee application work.¹

We categorized entries as either fee application work (highlighted in yellow in Exhibit 1) or retention application work (highlighted in red in Exhibit 1) based on each entry’s corresponding description. That said, our review revealed three entries that were coded to Task Code B160 but

¹ An excerpted copy of Exhibit C is attached hereto as Exhibit 1.



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do not relate to fee or retention application work. We respectfully submit that those entries are miscoded and should be removed from consideration. The entries in question are (i) .4 hours billed by Stephen Selbst on October 18, 2022; (ii) .3 hours billed by Stephen Selbst on January 20, 2023; and (iii) .4 hours billed by Steven Smith on January 30, 2023. Those entries are highlighted in red on the attached Exhibit 1.

After combing through the entries and tallying those in each category, Herrick found that a total of 81.7 hours fell into the category of retention application work, and a total of 60 hours fell into the category of fee application work.

Using the blended hourly rate of \$758.45 as set forth in the interim fee application, we calculate our total fee application work of 60 hours as amounting to \$45,507 (4.69% of Herrick's total fees incurred, i.e., \$969,749.00; and 5.44% of Herrick's total fees incurred post-reduction, i.e., \$837,749.00).

Should the Court consider Herrick's total fees incurred when determining Herrick's compliance with the *Mesa* guidelines, Herrick respectfully submits that its fees comply with the *Mesa* guidelines and asks that they be approved.

Should the Court consider Herrick's total fees incurred post-reduction when determining Herrick's compliance with the *Mesa* guidelines, Herrick respectfully requests that its fees be approved as reduced solely to the extent of ensuring compliance with the *Mesa* guidelines.

Respectfully submitted,

/s/ Stephen B. Selbst
Stephen B. Selbst



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Exhibit 1

Hearing Date and Time: August 30, 2023 at 10:00 a.m.
Objection Due Date and Time: August 23, 2023 at 4:00 p.m.

HERRICK, FEINSTEIN LLP

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Attorneys for the Debtor and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Chapter 11

WYTHE BERRY FEE OWNER LLC,

Case No. 22-11340 (MG)

Debtor.¹

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**SUMMARY COVER SHEET TO THE FIRST INTERIM FEE APPLICATION
OF HERRICK, FEINSTEIN LLP FOR ALLOWANCE OF FEES AND
REIMBURSEMENT OF EXPENSES INCURRED AS
BANKRUPTCY COUNSEL TO THE DEBTOR AND
DEBTOR IN POSSESSION FOR THE PERIOD
FROM OCTOBER 6, 2022 THROUGH MAY 31, 2023**

<i>General Information</i>	
Name of Applicant:	Herrick, Feinstein LLP ("Herrick")
Role of Herrick:	Bankruptcy Counsel to the Debtor and Debtor in Possession

¹ The Debtor's principal offices are located at 199 Lee Avenue, Suite 693, Brooklyn, New York 11211. The last four digits of the Debtor's Federal Tax Id. No. are 9776.

EXHIBIT C
(DETAILED TIME RECORDS)

EXHIBIT C



HERRICK

All Year Holdings Limited
Attn: Asaf Ravid and Ephraim Diamond
12 Spencer Street, 3rd Fl.
Brooklyn, NY 11205

April 18, 2023
Invoice Number: 581030
Matter Number: 20772.0003
Tax ID: [REDACTED] 1662

Re: **WB Fee Owner Bankruptcy**

Fees for legal services rendered through March 31, 2023	\$853,265.50
Expenses posted through March 31, 2023	26,433.24
TOTAL	<u>\$879,698.74</u>

INVOICE PAYMENT IS DUE UPON RECEIPT. THANK YOU.

Please make checks payable to
Herrick, Feinstein LLP and mail to:
HERRICK, FEINSTEIN LLP
Mail Code: 11163
P.O. Box 70280
Philadelphia, PA 19176-0280

Send **wire or ACH payments** to:
Citibank, N.A.
ABA Number: [REDACTED] 0089
Account Number: [REDACTED] 6165
SWIFT #: [REDACTED] US33

*Must include invoice number in
comment field*

Credit card payments:
www.herrickpay.com
URL/link redirects to our
processor SlimCD

*Please note as of September 1, 2022
there will be a 2.45% surcharge on all
credit card payments.*



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
10/10/22	S. Selbst	B190	Work with R Quigley on preparation of Rule 1007-2 declaration and first day motions.	0.70
10/10/22	R. Quigley	B190	Prepare 1007-2 declaration for potential consent to involuntary petition.	0.50
10/10/22	R. Quigley	B190	Review petition, summons, and statement of petitioning creditors in Mishmeret's involuntary bankruptcy filing.	0.20
10/11/22	S. Selbst	B160	Discuss conflicts issues with A Mehlman.	0.50
10/11/22	S. Selbst	B190	Review A Ravid first day declaration in All Year for applicability to Fee Owner involuntary response.	2.00
10/12/22	C. Carty	B110	Participate in call with A. Ravid, E. Diamond, S. Selbst, J. Goldberg, and A. Mehlman to discuss involuntary bankruptcy proceeding and response thereto.	0.60
10/12/22	C. Carty	B110	Review correspondence and related documents to prepare for call regarding involuntary proceeding and response thereto.	0.40
10/12/22	C. Carty	B110	Analyze research issues related to response to involuntary bankruptcy proceeding.	0.80
10/12/22	J. Goldberg	B190	Confer by phone with A. Ravid, E. Diamond, S. Selbst, C. Carty, A. Mehlman re: involuntary petition and strategy.	0.60
10/12/22	J. Goldberg	B190	Exchange email correspondence with Paul Hastings re: involuntary petition.	0.20
10/12/22	J. Goldberg	B190	Exchange email correspondence with Weil re: involuntary petition.	0.20
10/12/22	J. Goldberg	B190	Confer by phone with Mishmeret counsel, S. Selbst and C. Carty re: involuntary filing.	0.40
10/12/22	J. Goldberg	B190	Confer by phone with S. Selbst, C. Carty re: research and strategy for involuntary petition.	0.20
10/12/22	S. Selbst	B190	Participate in conference call with A Ravid and E Diamond re response to involuntary petition.	0.60
10/12/22	S. Selbst	B190	Participate in conference call with J Goldberg and Mishmeret re involuntary petition.	0.40
10/12/22	S. Selbst	B190	Send email to clients summarizing Mishmeret call regarding involuntary proceeding.	0.40
10/12/22	S. Selbst	B190	Discuss fiduciary duty research regarding involuntary proceeding with Z Denver.	0.30
10/12/22	Z. Denver	B120	Review case law re interaction of involuntary proceeding and LLC contract/fiduciary duties.	1.50
10/12/22	C. Halm	B190	Prepare for and attend call with Z. Denver to review legal research findings regarding involuntary bankruptcy petitions and responses/defenses to same.	0.20
10/12/22	R. Quigley	B190	Conduct analysis of issues for confirmation (1.1) and develop timeline for plan prosecution (1.0).	0.50



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
10/12/22	R. Quigley	B190	Draft and revise 1007-2 declaration for potential consent to involuntary petition.	0.50
10/13/22	C. Carty	B110	Review and analyze research related to involuntary bankruptcy filing.	0.60
10/13/22	J. Goldberg	B190	Confer by phone with A. Ravid, E. Diamond, S. Selbst, C. Carty re: involuntary petition strategy.	0.60
10/13/22	J. Goldberg	B190	Confer by phone with S. Selbst and Z. Denver re: fiduciary duty research for involuntary proceeding.	0.20
10/13/22	J. Goldberg	B190	Confer by phone with S. Selbst, M. Friedman re: involuntary petition.	0.50
10/13/22	J. Goldberg	B190	Confer by phone with S. Selbst re: action items for involuntary petition.	0.20
10/13/22	J. Goldberg	B190	Review document demands served on Mishmeret by Z. Weiss in connection with involuntary bankruptcy filing.	0.20
10/13/22	J. Goldberg	B190	Review Weiss discovery demands served on Mishmeret in involuntary proceeding.	0.20
10/13/22	S. Selbst	B190	Participate in conference call with J Goldberg and clients re involuntary petition.	0.50
10/13/22	S. Selbst	B190	Participate in conference call with J Goldberg and M Friedman re DIP financing.	0.50
10/13/22	S. Selbst	B190	Conduct analysis of standing to challenge involuntary bankruptcy petition.	0.60
10/13/22	S. Selbst	B160	Discuss potential debtor conflicts in representation and discuss with L Kelman and J Goldberg.	0.40
10/13/22	Z. Denver	B120	Draft analysis email to C. Carty re liability of managing member.	0.70
10/13/22	Z. Denver	B120	Review case law on fiduciary duty liability and trust beneficiary rights to bring involuntary bankruptcy.	0.80
10/13/22	C. Halm	B190	Conduct legal research on breaches of fiduciary duties w/r/t bankruptcy petitions/defenses.	1.00
10/13/22	C. Halm	B190	Conduct legal research on breaches of fiduciary duties by filing for bankruptcy.	0.50
10/14/22	J. Goldberg	B190	Review research and analysis of issues raised by involuntary proceeding.	3.20
10/14/22	J. Goldberg	B190	Confer by phone with E. Diamond re: involuntary proceeding.	0.70
10/14/22	J. Goldberg	B190	Confer by phone with M. Friedman, E. Silvestri, S. Selbst re: Weiss discovery requests in involuntary proceeding.	0.20
10/14/22	J. Goldberg	B190	Confer by phone with S. Selbst re: issues concerning involuntary proceeding.	0.30
10/14/22	J. Goldberg	B190	Review Bankruptcy Code Section 303 in preparation for responding to involuntary petition.	0.50



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
			for involuntary petition response.	
10/17/22	S. Stockman	B110	Confer with Herrick team regarding status of case.	0.70
10/17/22	S. Stockman	B110	Confer with Z. Denver regarding necessary research into issue of initiation of involuntary bankruptcy proceeding under guaranty agreement.	0.40
10/18/22	J. Goldberg	B190	Confer by phone with S. Selbst re: action items for involuntary proceeding.	0.10
10/18/22	J. Goldberg	B190	Confer by phone with S. Selbst, Z. Denver, R. Quigley and S. Stockman re: research and action items for involuntary proceeding.	0.50
10/18/22	S. Selbst	B190	Confer with team regarding open items and responses to involuntary petition.	0.50
10/18/22	S. Selbst	B190	Review Kingston Square and progeny on debtor fiduciary issues	0.70
10/18/22	S. Selbst	B160	Discuss issues regarding answer to involuntary petition with Z Denver and J Goldberg	0.40
10/18/22	S. Selbst	B190	Develop task lists of open items in response to involuntary petition	0.50
10/18/22	Z. Denver	B120	Confer with S. Selbst and J. Goldberg re strategy for managing members and next steps.	0.60
10/18/22	R. Quigley	B190	Attend call w. Z. Denver, S. Stockman, S. Selbst, and J. Goldberg re: next steps on involuntary bankruptcy matter.	0.50
10/18/22	S. Stockman	B190	Conduct legal research on issue of standing of holders of debentures or other securities to bring claims in conjunction with or in lieu of trustees' rights.	0.50
10/18/22	N. Rosen	B110	Research for Silvia Stockman on 1992 and 1995 court filings using Lexis, Westlaw, Bloomberg and PACER	0.40
10/19/22	J. Goldberg	B190	Confer by phone with A. Ravid, E. Diamond, S. Selbst, Z. Denver, R. Quigley re: analysis of issues pertaining to involuntary proceeding.	0.50
10/19/22	J. Goldberg	B190	Confer by phone with S. Selbst, Z. Denver, R. Quigley, S. Stockman re: action items for involuntary proceeding.	0.20
10/19/22	J. Goldberg	B190	Revise draft letter to M. Friedman re: involuntary proceeding.	0.50
10/19/22	J. Goldberg	B190	Confer by phone with A. Ravid, E. Diamond, S. Selbst, H. Wright, C. Caulfield re: involuntary proceeding	0.50
10/19/22	S. Selbst	B190	Review and revise letter to Mishmeret counsel and discuss with J Goldberg and Z Denver	0.70
10/19/22	S. Selbst	B190	Participate in conference call with A Ravid and E Diamond regarding response to involuntary	0.70
10/19/22	S. Selbst	B190	Review Mishmeret response to discovery requests	0.20



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
10/19/22	S. Selbst	B190	Work on memo to clients regarding fiduciary obligations of Wythe Berry managers	0.80
10/19/22	S. Selbst	B160	Discuss status of waiver requests with J Goldberg and Y Ben Ari.	0.40
10/19/22	S. Selbst	B190	Conduct analysis of 2004 discovery during gap period.	0.20
10/19/22	Z. Denver	B120	Review/revise letter to petitioning creditors regarding claims underlying involuntary petition.	0.70
10/19/22	Z. Denver	B190	Call with All Year team re next steps.	0.30
10/19/22	Z. Denver	B120	Call with client re response to involuntary petition.	0.60
10/19/22	S. Stockman	B110	Confer internally regarding case status and legal strategy.	0.20
10/19/22	A. Grillo	B110	Delivered a Collier section and directed Z. Denver to online access	0.20
10/20/22	J. Goldberg	B190	Confer by phone with A. Ravid, E. Diamond, S. Selbst, Z. Denver, R. Quigley re: issues relating to involuntary proceeding.	0.70
10/20/22	J. Goldberg	B190	Confer by phone with S. Selbst, M. Friedman re: involuntary proceeding.	0.30
10/20/22	S. Selbst	B160	Circulate revised Mishmeret waiver letter to Herrick team	0.50
10/20/22	S. Selbst	B190	Participate in telephone conference with M Friedman regarding response to letter regarding involuntary petition issues	0.40
10/20/22	S. Selbst	B190	Review Z Denver memorandum regarding fiduciary duties of managers	0.50
10/20/22	S. Selbst	B160	Participate in conference call with clients to discuss Mishmeret waiver request.	0.30
10/20/22	Z. Denver	B120	Call with C. Halm re breach of the duty of loyalty memo section.	0.30
10/20/22	Z. Denver	B120	Draft memo to client on managing member fiduciary duties associated with bankruptcy filing.	2.50
10/20/22	Z. Denver	B120	Call with client re responses to client questions regarding waiver and responses to Mishmeret letter.	0.70
10/20/22	R. Quigley	B190	Attend call w. Clients, J. Goldberg, S. Selbst, and Z. Denver re: responses to client questions regarding waiver and responses to Mishmeret letter.	0.70
10/20/22	S. Stockman	B190	Confer internally regarding responses to client questions regarding waiver and responses to Mishmeret letter.	0.70
10/21/22	J. Goldberg	B190	Confer by phone with A. Mehlman re: case status of involuntary proceeding.	0.10
10/21/22	J. Goldberg	B190	Confer by phone with Z. Denver re: client memo as to involuntary proceeding.	0.80



HERRICK

Invoice Number: 581030
Matter Number: 20772.0003
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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
10/21/22	J. Goldberg	B190	Confer by phone with Z. Denver re: client memo on involuntary proceeding.	0.30
10/21/22	S. Selbst	B160	Participate in telephone conference with M Friedman regarding waiver issues	0.40
10/21/22	S. Selbst	B160	Review and revise waiver letter per E Diamond comments	0.30
10/21/22	S. Selbst	B160	Discuss changes to waiver letter with Z Denver	0.20
10/21/22	S. Selbst	B190	Review revised memo regarding fiduciary duties	0.50
10/21/22	Z. Denver	B120	Confer with S. Selbst and J. Goldberg re retention letter changes.	0.10
10/21/22	Z. Denver	B120	Draft/revise memo to client re fiduciary duties.	1.30
10/23/22	R. Quigley	B190	Revise memorandum regarding fiduciary duties of managing member in connection with responding to the involuntary chapter 11 petition.	1.00
10/24/22	J. Goldberg	B190	Review memo re: fiduciary duty of managing member as to involuntary proceeding.	0.40
10/24/22	J. Goldberg	B190	Review and comment on updated draft fiduciary duty memo for involuntary proceeding.	0.90
10/24/22	J. Goldberg	B190	Confer by phone with Z. Denver re: fiduciary duty memo in connection with involuntary proceeding.	0.10
10/24/22	J. Goldberg	B190	Confer by phone with S. Selbst re: fiduciary duty memo for involuntary proceeding.	0.10
10/24/22	J. Goldberg	B190	Review letter from Petitioning Creditors responding to information request and accompanying DIP term sheet for involuntary proceeding.	0.30
10/24/22	J. Goldberg	B190	Confer by phone with Z. Denver re: corporate structure of debtor.	0.10
10/24/22	J. Goldberg	B190	Review updated fiduciary duty memo with Z. Denver, R. Quigley, S. Selbst for involuntary proceeding.	0.30
10/24/22	S. Selbst	B190	Review and revise memo to managing member regarding fiduciary duty issues	2.80
10/24/22	S. Selbst	B190	Conduct follow up call with Z Denver and J Goldberg regarding fiduciary duties memo.	0.40
10/24/22	S. Selbst	B190	Read Mishmeret response to discovery letter and discuss with J Goldberg	0.30
10/24/22	S. Selbst	B110	Review DIP term sheet and compare to All Year DIP terms	1.20
10/24/22	Z. Denver	B120	Confer with Herrick team re fiduciary duty memo and revisions thereto.	0.60
10/24/22	Z. Denver	B120	Revise waiver letter and email to Mishmeret counsel.	0.30
10/24/22	Z. Denver	B120	Email to E. Diamond re waiver letter.	0.20
10/24/22	R. Quigley	B190	Attend call w. Z. Denver, S. Selbst, and J. Goldberg re:	0.60



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
			memorandum on fiduciary duties of Wythe Berry Member LLC.	
10/24/22	S. Stockman	B190	Review correspondence from counsel to Z. Weiss regarding standing and discovery.	0.20
10/25/22	J. Goldberg	B190	Revise draft fiduciary duty memo to clients for purposes of involuntary proceeding.	0.70
10/25/22	J. Goldberg	B190	Review analysis of fiduciary duty in connection with involuntary proceeding.	1.60
10/25/22	J. Goldberg	B190	Confer by phone with S. Selbst, A. Ravid, E. Diamond, D. Sasson, Z. Denver, R. Quigley re: involuntary proceeding.	0.70
10/25/22	J. Goldberg	B190	Confer by phone with A. Ravid re: involuntary proceeding.	0.10
10/25/22	J. Goldberg	B190	Confer by phone with S. Selbst re: finalizing conflict waivers for involuntary proceeding.	0.20
10/25/22	S. Selbst	B160	Finalize conflict waivers for involuntary proceeding with Mishmeret.	0.40
10/25/22	S. Selbst	B160	Revise conflict waivers for involuntary proceeding.	0.30
10/25/22	S. Selbst	B190	Participate in conference call with A Ravid and E Diamond regarding memo on fiduciary duties of managing member, waivers and answer to involuntary petition	0.70
10/25/22	S. Selbst	B190	Revise fiduciary duty memo	1.70
10/25/22	S. Selbst	B110	Review DIP term sheet and provide comments to clients	1.10
10/25/22	S. Selbst	B190	Review and revise answer to involuntary petition	1.90
10/25/22	S. Selbst	B190	Participate in telephone conference with M Friedman regarding position of unsecured bondholders re involuntary petition	0.20
10/25/22	S. Selbst	B190	Write letter to M Friedman regarding bondholders position on involuntary proceeding.	0.30
10/25/22	Z. Denver	B190	Draft email to M. Friedman re amount of Guaranty claim.	0.20
10/25/22	Z. Denver	B120	Revise answer to involuntary petition.	1.00
10/25/22	Z. Denver	B120	Confer with Clients regarding case management questions on topics including waiver, DIP term sheet, fiduciary duty memo, and answer to involuntary petition.	0.70
10/25/22	Z. Denver	B120	Revise memorandum regarding fiduciary duties of managing member.	1.50
10/25/22	R. Quigley	B190	Attend call with S. Selbst, J. Goldberg, Z. Denver, and Clients re: outstanding questions on memorandum regarding fiduciary duties of managing member.	0.70
10/25/22	R. Quigley	B190	Draft waiver letters to send to petitioning creditors in	1.00



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
10/28/22	J. Goldberg	B190	Exchange email correspondence with Weiss counsel re: discovery meet and confer in involuntary proceeding.	0.20
10/28/22	J. Goldberg	B190	Confer by phone with M. Goren, S. Selbst re: Weiss motion in involuntary proceeding.	0.30
10/28/22	J. Goldberg	B190	Confer by phone with E. Diamond, A. Ravid, S. Selbst, Z. Denver, R. Quigley re: strategy and planning for involuntary proceeding.	0.50
10/28/22	S. Selbst	B190	Participate in conference call with J Goldberg and clients regarding list of open items regarding involuntary proceeding.	0.60
10/28/22	S. Selbst	B190	Participate in telephone conference with M Friedman regarding bondholder response to involuntary proceeding.	0.20
10/28/22	S. Selbst	B190	Discuss use of 2004 discovery with Z Denver and J Goldberg regarding Weiss	0.30
10/28/22	S. Selbst	B190	Work on 2004 motion regarding Weiss discovery	0.40
10/28/22	S. Selbst	B190	Discuss Weiss position on discovery and need for meet and confer with J Goldberg	0.30
10/28/22	Z. Denver	B120	Get title check done on William Vale.	0.30
10/28/22	Z. Denver	B190	Confer with E. Diamond and A. Ravid re post-Answer considerations.	0.50
10/28/22	Z. Denver	B190	Draft email to Weiss re 2004 discovery.	0.20
10/28/22	Z. Denver	B190	Confer with Herrick team re next steps.	0.70
10/28/22	S. Stockman	B190	Attend portion of internal strategy call relating to motion to dismiss opposition strategy.	0.40
10/28/22	S. Stockman	B190	Revise written plan for motion practice to reflect developments in strategy.	0.20
10/28/22	S. Stockman	B160	Confer with S. Selbst regarding retention application.	0.10
10/31/22	J. Goldberg	B190	Confer by phone with S. Selbst re: tasks needed for involuntary proceeding.	0.20
10/31/22	J. Goldberg	B190	Exchange email correspondence with N. Bassett re: meet and confer over discovery in involuntary proceeding.	0.20
10/31/22	J. Goldberg	B190	Review Weiss motion to dismiss involuntary petition and outline opposition brief.	1.20
10/31/22	S. Selbst	B190	Discuss discovery and meet and confer issue regarding Paul Hastings with J Goldberg	0.30
10/31/22	S. Selbst	B160	Review and approve NOAs for Herrick team	0.20
10/31/22	Z. Denver	B190	Submit title check application.	0.20
10/31/22	R. Quigley	B190	Begin drafting outline for opposition to motion to dismiss involuntary petition.	0.50
10/31/22	R. Quigley	B190	Analyze case law relevant to opposition to Weiss's	2.10



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
01/17/23	J. Goldberg	B190	Appear on behalf of Fee Owner at evidentiary hearing in court on Zelig Weiss motion to dismiss and/or intervene.	8.50
01/17/23	A. Mehlman	B410	Appear for hearing at Bankruptcy Court, SDNY, on behalf of Fee Owner, regarding Z. Weiss's motion to dismiss and/or intervene.	7.70
01/17/23	S. Selbst	B190	Prepare for and attend hearing on Weiss's motion to dismiss involuntary proceeding.	5.00
01/17/23	L. Schepp	B190	Attend and support attorneys during Evidentiary Hearing.	4.00
01/18/23	J. Goldberg	B190	Confer with A. Mehlman, S. Selbst re: strategy issues following entry of order of relief.	0.30
01/18/23	J. Goldberg	B190	Confer by phone with E. Diamond, A. Ravid, A. Mehlman, S. Selbst, M. Roe, Z. Denver re: strategy for involuntary bankruptcy.	0.90
01/18/23	S. Selbst	B230	Analyze bondholder DIP proposal	0.50
01/18/23	S. Selbst	B110	Conduct conference call with clients regarding initial tasks for case administration	1.20
01/18/23	S. Selbst	B110	Prepare for client call and create checklist for open tasks	0.60
01/18/23	S. Selbst	B230	Confer with S Smith regarding DIP financing	0.20
01/18/23	Z. Denver	B110	Confer with A. Ravid and E. Diamond re strategy for chapter 11 motions and filings.	0.60
01/18/23	Z. Denver	B110	Respond to partner questions post-order of relief responsibilities.	0.80
01/18/23	Z. Denver	B110	Circulate scheduling order and calendar invites.	0.30
01/18/23	Z. Denver	B160	Review sample disclosure statements and retention application documents.	1.00
01/19/23	J. Goldberg	B190	Review and collect discovery demands served in state court action and adversary proceeding to use for preparation of 2004 discovery.	0.40
01/19/23	J. Goldberg	B110	Confer by phone with S. Selbst and Z. Denver re: staffing and projects.	0.20
01/19/23	J. Goldberg	B190	Confer by phone with S. Selbst, Z. Denver, L. Pierre-Louis re: preparing 2004 discovery for debtor to serve.	0.70
01/19/23	S. Selbst	B110	Conference call with J Goldberg, Z Denver and L Pierre-Louis regarding open items for opening case	0.80
01/19/23	S. Selbst	B190	Work on 2004 discovery motions.	1.10
01/19/23	S. Selbst	B230	Confer with S Smith regarding DIP response	0.40
01/19/23	S. Selbst	B230	Review client comments on DIP term sheet	0.50
01/19/23	S. Selbst	B110	Analyze case tasks for planning purposes	0.80
01/19/23	S. Smith	B230	Conduct further review and analysis re, and discussion with S. Selbst re, draft DIP Term Sheet and related issues.	0.80



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
01/19/23	S. Smith	B230	Revise DIP term sheet.	0.80
01/19/23	Z. Denver	B160	Draft Herrick retention application.	2.00
01/19/23	Z. Denver	B110	Confer with S. Selbst, J. Goldberg, and L. Pierre-Louis re onboarding Luc Pierre-Louis.	0.70
01/19/23	Z. Denver	B190	Manage trial transcript request.	0.30
01/19/23	L. Pierre-Louis	B110	Attend call with S. Selbst, J. Goldberg, and Z. Denver regarding on-boarding, issuance of subpoena, and subsequent motion practice.	0.70
01/19/23	L. Pierre-Louis	B110	Review and Assess Chapter 11 Petition.	0.30
01/19/23	L. Pierre-Louis	B110	Review Unsecured Creditor's Statement and Involuntary Petition.	0.30
01/19/23	L. Pierre-Louis	B110	Analyze Debtor's Answer to Involuntary Petition as part of onboarding process.	0.60
01/19/23	L. Pierre-Louis	B110	Review Decl. in Support of Answer to understand relevant background.	0.40
01/19/23	L. Pierre-Louis	B110	Review LLC Agreement to understand relevant background.	0.90
01/19/23	L. Pierre-Louis	B110	Review Applicable Sections of the Ground Lease in Prep. of 2004 Discovery Demand	0.50
01/19/23	L. Pierre-Louis	B110	Review Hotel Management Agreement to understand relevant background.	0.60
01/20/23	J. Goldberg	B110	Confer by phone with S. Selbst, S. Smith, Z. Denver, L. Pierre-Louis re: ongoing projects concerning DIP financing, 2004 discovery, retention.	0.30
01/20/23	S. Selbst	B190	Review and revise notice of removal of state court litigation	0.40
01/20/23	S. Selbst	B110	Conduct telephone conference with E Diamond regarding preparation of schedules and SOFA by debtor	0.30
01/20/23	S. Selbst	B230	Analyze historical fees to develop DIP budget	2.30
01/20/23	S. Selbst	B230	Review and revise DIP term sheet	0.20
01/20/23	S. Selbst	B160	Review and revise Herrick retention application	0.60
01/20/23	S. Selbst	B190	Attend conference call with bondholder counsel regarding removal of state court litigation and DIP	0.70
01/20/23	S. Selbst	B110	Conduct update call with Herrick team on status of open matters	0.30
01/20/23	S. Selbst	B160	Attend telephone conference with J Hubbard regarding sale of Williamsburg Hotel and status of Wythe Berry case	0.30
01/20/23	S. Selbst	B190	Respond to E Diamond question regarding rejection of Fee Owner lease	0.50
01/20/23	S. Smith	B190	Participate in T/C with S. Selbst, Z. Denver, J. Goldberg and L. Plier-Louis to discuss open action items.	0.30



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
01/20/23	S. Smith	B230	Conduct follow up analysis related to proposed DIP Term Sheet.	0.40
01/20/23	S. Smith	B230	Conduct DIP Term Sheet related analysis.	0.60
01/20/23	S. Smith	B230	Review of, revisions to and circulate to client draft DIP Term Sheet.	0.40
01/20/23	S. Smith	B230	Confer with S. Selbst re DIP Term Sheet.	0.20
01/20/23	Z. Denver	B110	Confer with Herrick team re filing requirements.	0.70
01/20/23	Z. Denver	B160	Draft/revise Herrick retention application.	2.50
01/20/23	C. Halm	B190	Review and analyze prior Notice of Removal.	0.50
01/20/23	C. Halm	B190	Confer with S. Selbst regarding draft notice of removal.	0.10
01/20/23	C. Halm	B190	Draft Notice of Removal.	1.00
01/20/23	L. Poretsky	B110	Search forms of the fee application in various cases and submit to S. Selbst for review	0.50
01/22/23	Z. Denver	B110	Revise 2004 motion and application.	1.20
01/23/23	S. Selbst	B110	Work on motion for additional time to file statements and schedules	0.40
01/23/23	S. Selbst	B230	Revise DIP budget and send to A Ravid	1.30
01/23/23	S. Selbst	B230	Discuss DIP budget with A Mehlman	0.20
01/23/23	Z. Denver	B160	Revise retention application.	0.70
01/23/23	Z. Denver	B110	Confer with Chapman team re case status.	0.30
01/23/23	Z. Denver	B160	Continue to revise Herrick retention application.	2.30
01/23/23	C. Halm	B190	Revise notice of removal.	1.80
01/23/23	L. Pierre-Louis	B110	Confer with Z. Denver regarding 2004 Motion	0.50
01/23/23	L. Pierre-Louis	B110	Prepare outline of draft 2004 motion following call with Z. Denver.	0.50
01/24/23	J. Goldberg	B190	Review transcript from January 17 Evidentiary Hearing.	0.50
01/24/23	J. Goldberg	B160	Confer by phone with S. Selbst re: information for Herrick retention application and retention of hospitality consultant.	0.20
01/24/23	S. Selbst	B230	Revise DIP budget per client directions	2.10
01/24/23	S. Selbst	B160	Work on Herrick retention papers with Z Denver	0.40
01/24/23	S. Smith	B230	Conduct research and analysis for prep of first day affidavit.	0.70
01/24/23	S. Smith	B230	Participate in T/C with S. Selbst re DIP facility.	0.30
01/24/23	S. Smith	B230	Confer with L. Pierre-Louis re creditor matrix and related prep.	0.40
01/24/23	S. Smith	B230	Email correspondence from S. Selbst re entry of order for relief and upcoming deadlines for required filings.	0.30
01/24/23	S. Smith	B230	Further DIP Term Sheet analysis and discussion with S. Selbst and follow up with A. Ravid and E. Diamond	1.40



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
01/24/23	Z. Denver	B110	Confer with Herrick team and client regarding case management documents.	0.90
01/24/23	Z. Denver	B190	Confer with transcription service and Herrick team re trial transcript.	0.30
01/24/23	Z. Denver	B160	Continue revising Herrick retention application.	1.00
01/25/23	J. Goldberg	B160	Review proposed consulting agreement with hospitality advisor LHW.	0.40
01/25/23	J. Goldberg	B110	Confer by phone with A. Ravid, E. Diamond, Z. Denver re: case deadlines and task items.	0.50
01/25/23	J. Goldberg	B110	Confer by phone with S. Selbst, S. Smith, Z. Denver, L. Pierre-Louis, C. Halm re: retention, 2004 discovery, schedules, 1007-2 declaration and other projects.	0.40
01/25/23	J. Goldberg	B160	Confer with S. Selbst by phone re: proposed consulting agreement with LHW hospitality consultant.	0.20
01/25/23	J. Goldberg	B190	Confer by phone with S. Smith re: analysis of secured lenders rights to debtor cash.	0.30
01/25/23	J. Goldberg	B110	Confer by zoom with Bondholder representatives, Trustee, counsel to Petitioning Creditors, S. Selbst, A. Ravid and E. Diamond re: financing, removal, and strategy.	0.60
01/25/23	J. Goldberg	B110	Confer by phone with S. Selbst, A. Ravid and E. Diamond re: financing, removal and strategy.	0.50
01/25/23	J. Goldberg	B160	Revise draft email to Chambers requesting that the court enter a proposed order approving Herrick amended retention application as special counsel to debtor.	0.20
01/25/23	S. Selbst	B190	Review and revise notice of removal of state court litigation	1.10
01/25/23	S. Selbst	B190	Confer with bondholders regarding cash collateral and state court litigation.	0.70
01/25/23	S. Selbst	B230	Respond to client questions on DIP budget	0.50
01/25/23	S. Selbst	B190	Conduct pre-call with A Ravid and E Diamond prior to bondholder call	0.30
01/25/23	S. Selbst	B230	Analyze cash collateral issues regarding lease and 552(b)	1.10
01/25/23	S. Selbst	B110	Review and revise motion for additional time regarding schedules and motion to shorten time	1.10
01/25/23	S. Selbst	B160	Review and comment on proposed retention of LWH	0.70
01/25/23	S. Selbst	B230	Discuss cash collateral and automatic stay issues with N Basset	0.40
01/25/23	S. Selbst	B230	Discuss cash collateral issues and lease with J Goldberg	0.20
01/25/23	S. Selbst	B230	Confer with clients regarding cash collateral negotiations	0.40
01/25/23	S. Selbst	B230	Attend telephone conference with M Friedman regarding cash collateral stipulation	0.30



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
01/26/23	S. Smith	B230	Conduct further review of draft first day pleadings and motion to extend time	0.90
01/26/23	S. Smith	B230	Participate in team call to prepare for t/c with counsel for Mishmeret regarding cash collateral and case strategy.	0.30
01/26/23	S. Smith	B230	Review draft presentment for cash collateral stip	0.30
01/26/23	S. Smith	B230	Participate in t/c with counsel for mishmeret re cash collateral, case strategy	0.80
01/26/23	S. Smith	B230	Conduct further review of and revisions to draft cash collateral stipulation	0.40
01/26/23	Z. Denver	B160	Draft/review post-petition retention letter.	0.80
01/26/23	Z. Denver	B110	Confer with clients re priority of filings and pending motions.	0.50
01/26/23	Z. Denver	B110	Confer with L. Poretsky re upcoming filings and monitoring responsibilities.	0.60
01/26/23	Z. Denver	B190	Review case law on removal of interlocutory appeals.	1.30
01/27/23	J. Goldberg	B190	Revise 2004 discovery application and subpoenas.	2.20
01/27/23	J. Goldberg	B110	Confer by phone with Herrick team regarding outstanding case projects.	0.30
01/27/23	S. Selbst	B230	Prepare revised budget and cash collateral milestones and circulate to A Ravid and E Diamond	1.40
01/27/23	S. Selbst	B110	Conduct analysis of bar date and find precedents	0.40
01/27/23	S. Selbst	B230	Discuss chapter 11 milestones with A Ravid and E Diamond	0.30
01/27/23	S. Selbst	B230	Email M Friedman regarding cash collateral and milestones	0.40
01/27/23	S. Selbst	B110	Revise A Ravid Rule 1007-2 declaration (1.1); circulate the same to A Ravid and E Diamond (.1).	1.20
01/27/23	S. Selbst	B110	Confer with Herrick team regarding open items for next week	0.40
01/27/23	S. Selbst	B160	Work with Z Denver on Herrick 327(a) application	0.60
01/27/23	S. Selbst	B190	Work with C Halm and J Goldberg on notice of removal	0.30
01/27/23	S. Selbst	B110	Update task list for new items and remove old items	0.20
01/27/23	S. Smith	B320	Review form affidavit of service	0.10
01/27/23	S. Smith	B320	Finalize presentment for cash collateral and facilitate filing	0.60
01/27/23	S. Smith	B320	Review of and discussions re draft case milestones for cash collateral stip	0.80
01/27/23	S. Smith	B230	Participate in team call re open action items.	0.40
01/27/23	S. Smith	B230	Review latest draft first day declaration	0.80
01/27/23	S. Smith	B230	Discussions with S. Selbst, J. Goldberg and Z. Denver	0.50



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
			regarding same	
01/27/23	Z. Denver	B160	Analyze missing factual analysis needed for revised retention application.	0.50
01/27/23	Z. Denver	B110	Revise Rule 1007-2 affidavit and supporting schedules.	0.50
01/27/23	Z. Denver	B110	Confer with L. Poretsky re motion to extend time responsibilities.	0.30
01/27/23	Z. Denver	B110	Confer with Herrick team re outstanding motions and order of tasks for next week.	0.60
01/27/23	Z. Denver	B110	Prepare for meeting with Herrick team re case status and administration.	0.40
01/27/23	C. Halm	B190	Attend team call regarding latest case updates and assignment of key tasks.	0.40
01/27/23	C. Halm	B190	Begin drafting application for order establishing bar date.	0.80
01/27/23	C. Halm	B190	Conduct research on proper removal procedures.	0.50
01/27/23	C. Halm	B190	Conduct legal research on permissive and mandatory abstention.	0.50
01/27/23	M. Roe	B190	Conduct legal research re removal of state court case.	0.30
01/27/23	L. Poretsky	B110	Participate in Wythe Berry Update Call with the team	0.40
01/27/23	L. Poretsky	B110	Revise, finalize and e-file affidavit of service of motion and order	0.70
01/27/23	L. Poretsky	B110	Analyze bankruptcy court local rules to confirm one week notice of presentment date	0.40
01/27/23	L. Poretsky	B110	Revise and finalize draft of the notice of presentment and circulate for review and comments	0.40
01/27/23	L. Poretsky	B110	Draft affidavit of service of notice of presentment of motion to extend time to file schedules and order authorizing shortened time (.8); circulate to Herrick team for review (.1).	0.90
01/27/23	L. Poretsky	B110	Review docket for additional appearances.	0.30
01/27/23	L. Poretsky	B110	Compile service list in order to shorten time and motion to extend time to file schedules.	0.40
01/27/23	L. Poretsky	B110	Serve additional parties with the order to shorten time and motion to extend time to file schedules.	0.40
01/27/23	L. Poretsky	B110	Revise affidavit of service to add additional service parties and circulate for review	0.40
01/30/23	J. Goldberg	B190	Revise draft application for 2004 discovery (1.0); revise draft subpoena (.6).	1.60
01/30/23	J. Goldberg	B110	Confer by phone with A. Ravid, E. Diamond, S. Smith, Z. Denver re: cash collateral budget and upcoming motions and required filings.	0.40
01/30/23	J. Goldberg	B190	Implement revisions to draft model subpoena for hotel	0.60



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
			financial information.	
01/30/23	S. Smith	B190	Conduct preliminary review of full cash collateral order prepared by M. Friedman.	1.00
01/30/23	S. Smith	B190	Confer with Herrick team re 2004 discovery	0.30
01/30/23	S. Smith	B120	Review of first day affidavit and supporting schedules	0.90
01/30/23	S. Smith	B160	Confer with Assaf re case budget and related issues	0.40
01/30/23	S. Smith	B120	Review results of UCC search	0.20
01/30/23	S. Smith	B120	Discussions with J. Goldberg and Z. Denver regarding same	0.30
01/30/23	Z. Denver	B190	Confer with L. Pierre-Louis re discovery requests.	0.50
01/30/23	Z. Denver	B110	Confer with D. Sasson re Rule 1007-2 affidavit schedules.	0.70
01/30/23	Z. Denver	B110	Draft questions list to J. Goldberg and S. Smith re Rule 1007-2 affidavit.	0.40
01/30/23	Z. Denver	B110	Confer with S. Smith and J. Goldberg re affidavit schedules procedure.	0.50
01/30/23	Z. Denver	B110	Confer with D. Sasson re schedules questions.	0.50
01/30/23	Z. Denver	B110	Revise rule 1007-2 declaration.	1.50
01/30/23	Z. Denver	B110	Draft questions list to S. Smith and J. Goldberg re Rule 1007-2 declaration.	0.40
01/30/23	Z. Denver	B110	Draft email to S. Smith and J. Goldberg re task status list.	0.40
01/30/23	Z. Denver	B160	Revise post-petition engagement letter.	0.20
01/30/23	Z. Denver	B190	Review memo re removal of interlocutory appeal.	0.30
01/30/23	Z. Denver	B110	Confer with L. Pierre-Louis re treatment of mechanics liens for the Rule 1007-2 schedules.	0.60
01/30/23	Z. Denver	B110	Confer with Herrick team and client re budget questions.	0.30
01/31/23	J. Goldberg	B190	Confer by Zoom with M. Friedman, A. Ravid, E. Diamond, A. Mehlman, Z. Denver re: streamlining 2004 discovery and cash collateral/budget.	0.40
01/31/23	J. Goldberg	B110	Confer by phone with Z. Denver re: information for 1007-2 declaration.	0.30
01/31/23	J. Goldberg	B190	Confer by phone with Z. Denver, L. Pierre-Louis re: 2004 discovery.	0.60
01/31/23	J. Goldberg	B110	Revise budget for cash collateral management agreement.	0.40
01/31/23	A. Mehlman	B410	Analyze state court decisions in lease litigation (1.4); strategize for plan moving forward (.4).	1.80
01/31/23	Z. Denver	B110	Confer with D. Sasson re schedules questions.	0.30
01/31/23	Z. Denver	B190	Review/analyze and revise discovery requests and application.	3.30
01/31/23	Z. Denver	B110	Confer with L. Poretsky re service requirements.	0.40
01/31/23	Z. Denver	B110	Analyze tenant holdover question for balance sheet--	1.10



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
02/07/23	L. Poretsky	B110	Revise service list for regular mail per comments.	0.30
02/07/23	L. Poretsky	B110	Review notice of 341 Meeting and calendar accordingly	0.30
02/07/23	L. Poretsky	B120	Assemble final UCC and lien searches and circulate to the team	0.40
02/07/23	L. Poretsky	B230	Prepare filed Cash Collateral Motion for service via first class mail and serve accordingly	0.40
02/07/23	L. Poretsky	B110	Conference with Z. Denver to discuss sending letter to state court actions notifying of bankruptcy filing and provide a form of the letter.	0.40
02/07/23	L. Poretsky	B160	Conference with Z. Denver to discuss additional conflict search against parties to the state actions	0.20
02/07/23	L. Poretsky	B110	Conduct search for options to add new creditors on Court's Matrix and forward to S. Smith and L. Pierre-Louis	0.40
02/07/23	L. Poretsky	B110	Assemble and finalize letters to each State Court action notifying of Bankruptcy filing	0.40
02/07/23	L. Poretsky	B110	Serve respective judges and attorneys with the letters notifying of Bankruptcy filing via Federal Express	0.40
02/07/23	L. Poretsky	B230	Calendar deadlines and hearing date on cash collateral motion, including Judge's requirements for registration and telephonic hearing access.	0.50
02/07/23	L. Schepp	B190	Confirm process for ECF filing of notice of removal.	0.40
02/08/23	J. Goldberg	B140	Confer by phone with M. Friedman re: removal and stay of state court litigation.	0.20
02/08/23	J. Goldberg	B140	Confer by phone with N. Bassett re: removal and stay of state court litigation.	0.20
02/08/23	J. Goldberg	B140	Exchange email correspondence with A. Ravid and E. Diamond re: removal and stay of state court litigation.	0.20
02/08/23	J. Goldberg	B190	Exchange email correspondence with S. Sasson re: All Year/Fee Owner intercompany loan.	0.20
02/08/23	J. Goldberg	B190	Exchange email correspondence with A. Ravid re: receipt of certain Hotel financial information from Zelig Weiss.	0.20
02/08/23	J. Goldberg	B190	Exchange email correspondence with C. Halm and L. Schepp re: timing of filing notice of removal of state court litigation.	0.20
02/08/23	J. Goldberg	B310	Review proof of unsecured claim filed by Michael Prisco.	0.20
02/08/23	S. Selbst	B190	Discuss removal notice issues with J Goldberg	0.30
02/08/23	S. Selbst	B190	Read Glenn opinion denying Weiss motion to dismiss chapter 11	0.60
02/08/23	S. Selbst	B110	Emails to client team regarding initial debtor interview and 341 meeting	0.40
02/08/23	S. Selbst	B110	Discuss suggestion of bankruptcy issues with Z Denver	0.20



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
02/08/23	Z. Denver	B160	Analyze/review retention application.	1.20
02/08/23	L. Pierre-Louis	B110	Confer with Z. Denver to discuss interrogatory responses	0.30
02/08/23	R. Quigley	B190	Confer w. Z. Denver re: review of documents produced in response to state court subpoenas.	0.40
02/08/23	R. Quigley	B190	Continue to analyze documents produced in response to state court subpoenas (3.0) and draft digest re: the same (1.0).	4.00
02/09/23	J. Goldberg	B190	Confer by zoom with A. Ravid, M. Friedman, O. Tenenbaum re: removal and stay of state court litigation.	0.50
02/09/23	J. Goldberg	B190	Exchange email correspondence with D. Sasson re: review of documents provided by Z. Weiss.	0.20
02/09/23	J. Goldberg	B190	Confer by phone with R. Quigley re: review of Zelig Weiss documents.	0.20
02/09/23	J. Goldberg	B190	Confer by phone with N. Bassett, M. Friedman re: stay stipulation.	0.50
02/09/23	J. Goldberg	B190	Confer by phone with A. Ravid re: summary of discussion between counsel as to stay stipulation and removal.	0.20
02/09/23	J. Goldberg	B190	Review prepared filings in connection with removing state court litigation to federal court.	0.70
02/09/23	J. Goldberg	B190	Draft notice of filing of notice of removal.	0.20
02/09/23	J. Goldberg	B190	Work with L. Schepp to file all necessary documents to effectuate removal of state court litigation as adversary proceeding in bankruptcy court.	1.20
02/09/23	J. Goldberg	B190	Draft corporate disclosure statement for debtor Wythe Berry Fee Owner LLC in connection with removal of state court litigation as adversary proceeding.	0.30
02/09/23	J. Goldberg	B190	Exchange email correspondence with L. Schepp and C. Halm re: preparing notice of removal filing.	0.20
02/09/23	J. Goldberg	B190	Research timing for party to move to remand a state court litigation following filing of notice of removal pursuant to applicable statutes and local rules.	0.80
02/09/23	S. Selbst	B110	Attend telephone conference with E Diamond regarding removal notice and filing of statements and schedules	0.30
02/09/23	S. Selbst	B190	Attend telephone conference with J Goldberg regarding motion to remand removal notice and filing requirements for notice of removal	0.60
02/09/23	S. Selbst	B110	Review and revise statements and schedules	0.50
02/09/23	S. Smith	B110	Review draft schedules and SOFA	0.80
02/09/23	S. Smith	B190	Analysis of removal/remand per 28 USC 1447, 1452 and FRBP 9027	0.40
02/09/23	S. Smith	B190	Discussion with J. Goldberg re analysis of	0.20



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
02/09/23	S. Smith	B190	removal/remand.	
02/09/23	S. Smith	B190	Review of and attention to email traffic from D. Sasson and team re analysis of removal/remand.	0.20
02/09/23	S. Smith	B190	Discussions with Z. Denver and team re analysis of removal/remand.	0.30
02/09/23	Z. Denver	B140	Coordinate letters to the court re application of automatic stay.	0.40
02/09/23	Z. Denver	B160	Draft retention application documents.	3.40
02/09/23	C. Halm	B190	Calls with L. Schepp re filing notice of removal.	0.40
02/09/23	C. Halm	B190	Proof-read Notice of removal for filing (.4); draft civil cover sheet (.6); review and analyze docket exhibits for accuracy in preparation for filing of Notice of Removal (1.8).	2.80
02/09/23	R. Quigley	B190	Continue to analyze documents produced in response to state court subpoenas (1.0) and draft digest re: the same (.5).	1.50
02/09/23	M. Roe	B190	Analyze/revise exhibits to notice of removal.	0.80
02/09/23	M. Roe	B190	Email lender counsel re WV Hospitality subpoena production.	0.10
02/09/23	M. Roe	B190	Confer w/ J. Goldberg re subpoena productions.	0.10
02/09/23	L. Poretsky	B230	Draft, revise and finalize affidavit of service of Cash Collateral Motion and circulate for review	0.80
02/09/23	L. Poretsky	B110	Conference with L. Schepp and advise on filing of notice of removal	0.50
02/09/23	L. Schepp	B190	Compile exhibits for Goldberg declaration for Notice of Removal filings.	1.20
02/09/23	L. Schepp	B190	Review other Notice of Removal filings in SDNY for understanding of process.	0.60
02/09/23	L. Schepp	B190	Finalize and file Notice of Removal and Notice of Notice of Removal in SDNY and Kings County.	3.80
02/10/23	J. Goldberg	B140	Review draft of stipulation concerning stay of state court litigation.	0.30
02/10/23	J. Goldberg	B190	Exchange email correspondence with L. John, L. Schepp, C. Halm re: filing civil cover sheet for removed state court litigation.	0.20
02/10/23	J. Goldberg	B190	Revise draft civil cover sheet for removed state court litigation.	0.20
02/10/23	J. Goldberg	B160	Review proposed engagement letter for LW Hospitality Advisers.	0.30
02/10/23	J. Goldberg	B160	Exchange email correspondence with A. Ravid re: proposed engagement letter for LW Hospitality Advisers.	0.20
02/10/23	J. Goldberg	B160	Revise language in draft engagement letter with LW	0.20



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			Hospitality Advisers.	
02/10/23	J. Goldberg	B140	Revise proposed stipulation re: removal and stay of state court litigation.	0.30
02/10/23	J. Goldberg	B140	Exchange email correspondence with M. Friedman re: edits to proposed stipulation re: removal and stay of state court litigation.	0.20
02/10/23	J. Goldberg	B160	Exchange email correspondence with A. Ravid, S. Selbst, E. Weiss re: process for LWHA retention.	0.20
02/10/23	J. Goldberg	B140	Exchange email correspondence with M. Friedman re: bondholder comments to stay stipulation.	0.20
02/10/23	J. Goldberg	B190	Exchange email correspondence with Managing Attorney re: comments from SDNY clerk re: removal filing.	0.20
02/10/23	J. Goldberg	B160	Exchange email correspondence with Z. Denver and C. Thornton re: Herrick pre petition claim against Debtor for unpaid invoices.	0.20
02/10/23	S. Selbst	B160	Review proposed LWHA engagement letter and provide comments	0.50
02/10/23	S. Selbst	B160	Advise clients on retention of professionals and fee application process	0.90
02/10/23	S. Selbst	B110	Discuss status of removal notice with J Goldberg	0.30
02/10/23	S. Selbst	B110	Work with Z Denver on schedules and statements	0.40
02/10/23	S. Selbst	B190	Discuss Weiss negotiations and stay of litigation	0.40
02/10/23	S. Smith	B110	Conduct further analysis and provide answers regarding prep of schedules and SOFA (1.0) and discussion with Z. Denver re same (.1).	1.10
02/10/23	Z. Denver	B110	Analyze and revise schedules and statements.	3.20
02/10/23	Z. Denver	B160	Draft/revise Herrick retention application.	2.80
02/10/23	C. Halm	B190	Revise civil cover sheet draft for JG.	0.40
02/10/23	L. Poretsky	B230	Finalize and e-file Affidavit of Service of Motion to Approve Use of Cash Collateral	0.50
02/10/23	L. Poretsky	B140	Search for the form of letters re violating the automatic stay and submit to Z. Denver.	0.50
02/10/23	L. Schepp	B190	Revise captions in preparation for refiling Notice of Removal documents per ECF clerk notice.	0.40
02/13/23	J. Goldberg	B190	Exchange email correspondence with A. Ravid re: LWHA proposal, removal stipulation.	0.20
02/13/23	J. Goldberg	B190	Exchange email correspondence with N. Bassett re: removal stipulation.	0.20
02/13/23	J. Goldberg	B160	Confer by phone with A. Ravid re: LWHA retention and engagement letter.	0.20
02/13/23	J. Goldberg	B160	Review revised LWHA engagement letter.	0.20



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
02/13/23	J. Goldberg	B190	Confer by phone with Z. Denver re: 2004 discovery.	0.20
02/13/23	J. Goldberg	B110	Confer by phone with S. Selbst re: matter status.	0.20
02/13/23	S. Selbst	B160	Email discussion with clients re LWHA retention issues.	0.50
02/13/23	S. Selbst	B140	Discuss status of removal and stay by Weiss with J Goldberg.	0.40
02/13/23	S. Selbst	B160	Review and revise fees provision of LWHA engagement letter.	0.40
02/13/23	S. Selbst	B160	Review and comment on Herrick retention application.	0.50
02/13/23	S. Selbst	B150	Scheduling of 341 meeting and initial debtor interview with US Trustee.	0.30
02/13/23	S. Smith	B190	Review draft 327(a) application.	0.30
02/13/23	Z. Denver	B110	Confer with J. Goldberg re negotiations with Weiss counsel.	0.20
02/13/23	Z. Denver	B160	Revise Herrick retention papers.	3.10
02/13/23	Z. Denver	B150	Coordinate IDI letter and delivery to UST.	0.20
02/13/23	Z. Denver	B110	Analyze/revise statements and schedules.	0.50
02/14/23	S. Selbst	B160	Review and comment on LWHA engagement letter and discuss with J Goldberg.	0.50
02/14/23	S. Selbst	B310	Discuss bar date motion with Z Denver and send him samples	0.70
02/14/23	S. Selbst	B230	Review new comments on cash collateral stipulation	0.40
02/14/23	S. Selbst	B190	Review emails from clients regarding status of removal notice	0.30
02/14/23	S. Selbst	B110	Discuss status of negotiations for Weiss standstill with J Goldberg.	0.20
02/14/23	S. Selbst	B110	Respond to US trustee regarding initial debtor interview	0.20
02/14/23	S. Selbst	B160	Review and comment on Herrick 327(a) application	0.40
02/14/23	S. Selbst	B140	Discuss Schimenti litigation and automatic stay with Z Denver	0.20
02/14/23	S. Selbst	B110	Work with Z Denver on amendments to schedules	0.30
02/14/23	S. Smith	B190	Review transfer order.	0.30
02/14/23	Z. Denver	B110	Draft/revise case management conference order.	3.30
02/14/23	Z. Denver	B110	Confer with Herrick team re case administration tasks.	0.50
02/14/23	L. Poretsky	B110	Review adversary proceeding related to removal from state court to bankruptcy court re deficiencies.	0.30
02/14/23	L. Poretsky	B110	E-mail team re filing notices of appearance in Adversary Proceeding case	0.20
02/14/23	L. Poretsky	B110	Draft form of the notice of appearance in Adversary Proceeding action	0.90
02/14/23	L. Schepp	B190	Compile documents for service of removal filings (.4) and confirm procedure for the same (.2).	0.60



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
02/15/23	J. Goldberg	B190	Revise affidavit of service and service list for notice of removal of state court litigation and related papers.	0.60
02/15/23	J. Goldberg	B110	Exchange email correspondence with D. Sasson re: intercompany loan between All Year and Fee Owner appearing on schedules.	0.30
02/15/23	J. Goldberg	B230	Exchange email correspondence with N. Bassett re: Weiss comments to proposed cash collateral order.	0.30
02/15/23	J. Goldberg	B190	Exchange email correspondence with D. Sasson re: All Year/Fee Owner intercompany loan.	0.20
02/15/23	J. Goldberg	B190	Exchange email correspondence with M. Friedman re: removal of state court litigation.	0.20
02/15/23	J. Goldberg	B190	Exchange email correspondence with E. Diamond re: removal of state court litigation.	0.20
02/15/23	J. Goldberg	B230	Exchange email correspondence with M. Friedman and H. Honig re: Petitioning Creditors response to Paul Hastings comments to proposed cash collateral order.	0.30
02/15/23	J. Goldberg	B160	Exchange email correspondence with A. Ravid re: LWHA retention application.	0.20
02/15/23	S. Selbst	B110	Work with Z Denver on completion of schedules and SOFA and creditor matrix	0.40
02/15/23	S. Selbst	B110	Discuss prep for initial debtor interview with Z Denver	0.20
02/15/23	S. Selbst	B230	Review Weiss and bondholder comments on cash collateral stipulations	0.50
02/15/23	S. Selbst	B160	Discuss LWHA retention with J Goldberg	0.20
02/15/23	S. Selbst	B190	Discuss removal of state court litigation with J Goldberg	0.20
02/15/23	S. Smith	B230	Review M. Friedman comments to N. Basset mark-up re cash collateral order.	0.80
02/15/23	S. Smith	B110	Confer with Z. Denver, L. Pierre-Louis and L. Poretsky re preparation of schedules and creditor matrix.	0.70
02/15/23	Z. Denver	B310	Draft bar date motion.	1.50
02/15/23	Z. Denver	B110	Revise creditor matrix.	0.60
02/15/23	C. Halm	B310	Conduct research re Bar Date deadline and procedural requirements.	1.40
02/15/23	L. Pierre-Louis	B110	Review of Creditor Matrix	0.30
02/15/23	L. Pierre-Louis	B110	Confer with Steve Smith and L. Poretsky to discuss submission of creditor matrix	0.00
02/15/23	L. Pierre-Louis	B110	Revise creditor matrix	0.30
02/15/23	L. Pierre-Louis	B110	Confer with Z. Denver and S. Stockman to discuss revisions to creditor matrix	0.20
02/15/23	L. Pierre-Louis	B110	Revise and circulate final draft of creditor matrix for filing.	1.00
02/15/23	L. Pierre-Louis	B110	Communicate with L. Poretsky re: revisions to research	0.60



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
02/15/23	M. Roe	B190	Email team re initial adversary proceeding conference.	0.10
02/15/23	L. Poretsky	B110	Participate in the conference call discussing finalizing and filing creditor matrix	0.70
02/15/23	L. Poretsky	B110	Draft and revise Notices of Appearance in Adversary Proceeding case for Avery Mehlman, Stephen Selbst, Meaghan Roe, Rodger Quigley., Zachary Denver (2.6) and circulate for review (.1)	2.70
02/15/23	L. Schepp	B190	Draft certificate of service for removal filings.	0.80
02/16/23	J. Goldberg	B160	Confer by phone with S. Selbst re: retention application for LWHA hospitality advisors.	0.20
02/16/23	J. Goldberg	B230	Confer by phone with S. Smith re: comments from Paul Hastings and Chapman to cash collateral order.	0.20
02/16/23	J. Goldberg	B190	Review documents provided by D. Sasson related to All Year/Fee Owner intercompany loan.	0.20
02/16/23	J. Goldberg	B160	Exchange email correspondence with R. Quigley re: LWHA retention application.	0.20
02/16/23	J. Goldberg	B160	Exchange email correspondence with N. Bassett re: LWHA engagement letter.	0.20
02/16/23	J. Goldberg	B230	Review draft of proposed cash collateral order incorporating Herrick and Chapman comments in response to Paul Hastings comments.	0.20
02/16/23	J. Goldberg	B230	Exchange email correspondence with A. Ravid and E. Diamond re: revised draft of cash collateral order.	0.20
02/16/23	S. Selbst	B230	Attend telephone conference with J Hubbard regarding sale of W Vale Hotel	0.50
02/16/23	S. Selbst	B110	Attend telephone conference with court regarding filing of creditor matrix.	0.30
02/16/23	S. Selbst	B190	Discuss motion for summary judgment on lease issue with J Goldberg.	0.30
02/16/23	S. Selbst	B160	Discuss LWHA retention with J Goldberg.	0.20
02/16/23	S. Selbst	B230	Review cash collateral comments with S Smith.	0.30
02/16/23	S. Selbst	B110	Attend telephone conference with Z Denver regarding preparation for IDI and filing of creditor matrix.	0.30
02/16/23	S. Smith	B230	Revisions to draft Cash Collateral Order	0.30
02/16/23	S. Smith	B230	Discussions with J. Goldberg cash collateral comments.	0.20
02/16/23	S. Smith	B230	Review comments from M. Friedman and N. Basset re cash collateral comments.	0.30
02/16/23	Z. Denver	B150	Draft letter to UST re pre-IDI information.	2.70
02/16/23	Z. Denver	B110	Confer with L. Poretsky, L. Schepp, J. Goldberg, and S. Selbst re case management questions.	1.20
02/16/23	Z. Denver	B110	Review/revise creditor matrix.	0.30
02/16/23	L. Pierre-Louis	B110	Review final draft of creditor matrix ahead of filing.	1.10



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
02/16/23	R. Quigley	B160	Analyze engagement letter, retention application precedents, and relevant bankruptcy rules in preparation for drafting retention application to employ hospitality advisory.	3.10
02/16/23	R. Quigley	B110	Review notice of appearance prepared for filing.	0.10
02/16/23	M. Roe	B190	Confer w/ J. Goldberg re updating draft summary judgment motion, for filing in adversary proceeding.	0.40
02/16/23	M. Roe	B190	Analyze draft summary judgment papers.	0.20
02/16/23	L. Poretsky	B110	Revise and update notices of appearance in Adversary Proceeding case for Avery Mehlman, Stephen Selbst, Meaghan Roe, Rodger Quigley, Zachary Denver (.9) and circulate for review (.1)	1.00
02/16/23	L. Poretsky	B110	Revise and finalize creditor matrix and e-file	0.50
02/16/23	L. Poretsky	B110	Prepare Matrix for service upon notice parties and serve accordingly	0.50
02/16/23	L. Poretsky	B110	Prepare list of creditors in TXT format and upload via court website	1.20
02/16/23	L. Poretsky	B110	Discuss with Z. Denver issues with filed matrix per court comments.	0.30
02/16/23	L. Poretsky	B110	Analyze options to fix the issue raised by court regarding filed matrix	0.50
02/16/23	L. Schepp	B190	Compile filings and service of removal filings.	2.10
02/17/23	J. Goldberg	B190	Review draft memo to client re: items missing from WB LLC and Weiss document production.	0.30
02/17/23	J. Goldberg	B190	Confer by phone with A. Ravid, E. Diamond, D. Sasson, Z. Denver re: LWHA, retention, stay stipulation with Weiss, document production.	0.40
02/17/23	J. Goldberg	B120	Confer by phone with S. Selbst re: strategy for refinance vs sale of asset.	0.20
02/17/23	J. Goldberg	B190	Confer by phone with Z. Denver re: materials for IDI.	0.20
02/17/23	J. Goldberg	B190	Confer by phone with R. Quigley re: document review.	0.20
02/17/23	J. Goldberg	B150	Obtain certificates of occupancy for debtor property for US Trustee letter submission.	0.20
02/17/23	S. Selbst	B230	Respond to comments on cash collateral stipulation.	0.40
02/17/23	S. Selbst	B160	Review and provide comments on draft of LWHA retention application.	0.80
02/17/23	S. Selbst	B190	Conduct update call with J Goldberg on removal, 2004 status and negotiations with Z Weiss.	0.40
02/17/23	S. Selbst	B110	Work on schedules and statements with Z Denver.	0.30
02/17/23	S. Selbst	B150	Discuss letter to US Trustee and IDI prep with Z Denver.	0.30
02/17/23	Z. Denver	B310	Draft bar date motion.	3.20
02/17/23	Z. Denver	B110	Confer with S. Selbst, J. Goldberg, and L. Poretsky re case	0.40



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
			management and outstanding filings.	
02/17/23	Z. Denver	B110	Draft order scheduling initial case conference.	1.10
02/17/23	Z. Denver	B140	Draft automatic stay to mechanic lien holders.	1.10
02/17/23	Z. Denver	B110	Call with clients re case administration and negotiation with Weiss.	0.30
02/17/23	C. Halm	B310	Draft Bar Date Application and Bar Date Order.	2.70
02/17/23	L. Pierre-Louis	B110	Review of document production and write up to client	1.40
02/17/23	R. Quigley	B160	Analyze relevant Bankruptcy rules and precedents related to application to employ hospitality advisor in the SDNY Bankruptcy Court.	1.10
02/17/23	R. Quigley	B110	Review excel spreadsheet based on chart from Client, describing what documents were produced in response to state court subpoenas and what documents were requested that were not produced.	0.60
02/17/23	R. Quigley	B160	Draft retention application to employ LWHA as hospitality advisor.	5.40
02/17/23	M. Roe	B190	Analyze notice of appearance for adversary proceeding.	0.10
02/17/23	L. Poretsky	B110	Made several phone call and left messages with the clerks of bankruptcy court re issue raised by court regarding filed matrix.	0.70
02/17/23	L. Poretsky	B110	Circulate updated versions of the notices of appearance in Adversary Proceeding.	0.30
02/17/23	L. Poretsky	B110	Conduct phone calls with S. Selbst, Z. Denver, M. Roe and A. Mehlman and to discuss details of notices of appearance, obtain permission to file	0.80
02/17/23	L. Poretsky	B110	Conduct phone call and exchange e-mails with courtroom deputy and law clerk to obtain hearing date for case management conference.	0.80
02/17/23	L. Poretsky	B110	Circulate available hearing dates received from court and confirm date of the hearing.	0.40
02/17/23	L. Poretsky	B110	Revise draft of the proposed order scheduling case management conference and circulate for review and approval	0.70
02/17/23	L. Poretsky	B110	Analyze judge Glenn local rules on submission of proposed orders	0.30
02/17/23	L. Poretsky	B110	Prepare and submit e-mail to judge submitting proposed order scheduling case conference	0.40
02/17/23	L. Poretsky	B110	Analyze creditors' list and prepare for the service via first class mail	0.80
02/20/23	S. Smith	B230	Review M. Friedman and N. Bassett's cash collateral comments.	0.30
02/20/23	S. Smith	B310	Review draft Bar Date motion.	0.20



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
02/20/23	R. Quigley	B160	Revise and edit retention application to employ LWHA as hospitality advisor.	1.90
02/21/23	J. Goldberg	B190	Confer by zoom with M. Friedman re: negotiating stipulation with Weiss.	0.30
02/21/23	J. Goldberg	B190	Confer by phone with A. Ravid re: Weiss comments to draft stipulation.	0.30
02/21/23	J. Goldberg	B190	Confer by phone with M. Friedman re: Weiss comments to stipulation.	0.30
02/21/23	J. Goldberg	B190	Draft email to N. Bassett responding to comments to draft stipulation.	0.20
02/21/23	S. Selbst	B160	Discuss Herrick retention issues with Z Denver	0.20
02/21/23	S. Selbst	B230	Discuss prep for cash collateral hearing and objection deadline with Z Denver	0.30
02/21/23	S. Selbst	B150	Discuss prep for initial debtor interview and 341 meeting with Z Denver	0.40
02/21/23	S. Selbst	B230	Discuss Weiss negotiations and cash collateral with J Goldberg	0.20
02/21/23	S. Selbst	B230	Review comments from Weiss counsel on cash collateral	0.20
02/21/23	S. Smith	B230	Further analysis and attention to cash collateral issues.	0.60
02/21/23	S. Smith	B160	Analyze 327(a) application and Z. Denver email correspondence re same.	0.30
02/21/23	Z. Denver	B110	Draft IDI certifications.	1.10
02/21/23	Z. Denver	B160	Coordinate post-petition engagement letter signature.	0.40
02/21/23	Z. Denver	B110	Confer with Herrick team re outstanding documents for filing.	1.30
02/21/23	Z. Denver	B110	Revise letter to UST re pre-IDI delivery.	0.70
02/21/23	Z. Denver	B110	Revise service labels.	0.30
02/21/23	Z. Denver	B160	Revise Herrick retention application.	2.50
02/21/23	L. Pierre-Louis	B120	Coordinate mailing to mechanic's lien claimants with L. Schepp.	1.60
02/21/23	R. Quigley	B160	Confer w. Client and LWHA re: retention application and accompanying affidavit.	0.30
02/21/23	R. Quigley	B160	Revise and edit retention application to employ LWHA as hospitality advisor.	2.50
02/21/23	L. Poretsky	B110	Prepare court order scheduling initial case conference for service via e-mail and serve accordingly	0.50
02/21/23	L. Poretsky	B110	Revise service list via first class mail per attorneys' comments	0.40
02/21/23	L. Poretsky	B110	Revise service list to include all notice parties and creditors to be served with the order scheduling initial case conference (.8) and circulate for review (.1).	0.90



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
02/21/23	L. Poretsky	B110	Contact clerks of bankruptcy court re issue raised by court regarding filed matrix and options for fixing if needed	0.20
02/21/23	L. Poretsky	B110	Revise, finalize and prepare S. Selbst, A. Mehlman and M. Roe's notices of appearance for filing (1.0) and e-file in Adversary Proceeding case (.2)	1.20
02/21/23	L. Schepp	B120	Draft and arrange for mailing of lien notice letters.	0.90
02/22/23	J. Goldberg	B140	Confer by zoom with N. Bassett, W. Farmer, M. Friedman re: stay stipulation issues.	0.80
02/22/23	J. Goldberg	B140	Confer by phone with A. Ravid re: stay stipulation issues discussed with Paul Hastings and Chapman.	0.20
02/22/23	J. Goldberg	B160	Confer by phone with S. Selbst re: LWHA retention application.	0.20
02/22/23	J. Goldberg	B190	Confer by phone with M. Friedman re: calculating total amount of pre-petition obligations.	0.20
02/22/23	S. Selbst	B160	Work on revisions to LWHA application and agreement with R Quigley.	1.20
02/22/23	S. Selbst	B160	Review and comment on Herrick 327(a) application.	0.70
02/22/23	S. Selbst	B310	Review and provide comments on draft of bar date order.	0.60
02/22/23	S. Selbst	B110	Conference call with clients regarding prep for initial debtor interview.	0.40
02/22/23	S. Selbst	B110	Provide advice to Z Denver regarding scope of initial debtor interview.	0.30
02/22/23	S. Selbst	B110	Review and provide comments on schedules and SOFA.	0.60
02/22/23	S. Selbst	B230	Discuss status of cash collateral stipulation and Weiss standstill with J Goldberg.	0.20
02/22/23	S. Smith	B230	Review M. Friedman email re cash collateral order	0.10
02/22/23	S. Smith	B230	Review revised order marked against prior draft	0.40
02/22/23	Z. Denver	B110	Call with E. Diamond and A. Ravid re IDI preparation.	0.40
02/22/23	Z. Denver	B110	Confer with S. Selbst re edits case administration documents.	0.20
02/22/23	Z. Denver	B110	Review/revise certificate of service.	0.20
02/22/23	Z. Denver	B110	Review/analyze schedules and statements.	1.50
02/22/23	Z. Denver	B110	Review/revise case to-do list.	0.20
02/22/23	L. Pierre-Louis	B150	Draft questions ahead of Section 341 Meeting	1.00
02/22/23	L. Pierre-Louis	B150	Call with Z. Denver regarding upcoming 341 Meeting	0.50
02/22/23	R. Quigley	B160	Revise and edit retention application per feedback from Client and LWHA.	1.50
02/22/23	S. Stockman	B160	Confer with Z. Denver regarding upcoming fee statement submission.	0.30



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02/22/23	L. Poretsky	B110	Draft, revise, finalize and e-file affidavit of service of order scheduling case conference	1.20
02/22/23	L. Poretsky	B110	Follow up with court clerk re issue of filing list of creditors and options to fix.	0.40
02/22/23	L. Poretsky	B110	Review drafts of the schedules and SOFA	0.60
02/22/23	L. Poretsky	B160	Review drafts of the documents related to LWHA application and submit comments to R. Quigley	0.50
02/22/23	L. Poretsky	B160	Revise and assemble LWHA application to employ and circulate for review	0.80
02/22/23	L. Poretsky	B160	Follow up on a status of filing of LWHA employment application and wait for permission from LWHA proceed with filing	2.00
02/23/23	J. Goldberg	B140	Revise draft stay stipulation and annexed document request.	1.30
02/23/23	J. Goldberg	B230	Confer by phone with Z. Denver re: revised proposed cash collateral order.	0.20
02/23/23	J. Goldberg	B160	Confer by phone with R. Quigley re: finalizing LWHA retention application.	0.20
02/23/23	J. Goldberg	B140	Confer by phone with N. Bassett re: stay stipulation and document request comments.	0.30
02/23/23	J. Goldberg	B110	Confer by phone with S. Selbst re: initial debtor interview.	0.20
02/23/23	S. Selbst	B110	Initial debtor interview with US Trustee's office	0.50
02/23/23	S. Selbst	B110	Follow up call with A Ravid and E Diamond	0.50
02/23/23	S. Selbst	B110	Work with Z Denver on schedules	0.50
02/23/23	S. Selbst	B230	Discuss revised cash collateral stipulation with J Goldberg	0.30
02/23/23	S. Selbst	B160	Work with R Quigley on revisions to LWHA engagement	0.50
02/23/23	S. Selbst	B160	Conduct telephone conference with A Mehlman regarding adjustments to prior Herrick fees	0.30
02/23/23	S. Selbst	B230	Review Weiss and bondholder comments to cash collateral stipulation	0.70
02/23/23	S. Smith	B230	Further review of and attention to email correspondence from M. Friedman re cash collateral.	0.20
02/23/23	Z. Denver	B160	Call with A. Mehlman and S. Stockman re fee application.	0.30
02/23/23	Z. Denver	B160	Review bills for state court matter for fee application.	0.60
02/23/23	Z. Denver	B110	Attend IDI call with J. Nadkarni.	0.60
02/23/23	Z. Denver	B110	Confer with clients re follow up on IDI and status of documents to file.	0.30
02/23/23	Z. Denver	B110	Revise IDI certifications.	0.30



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
02/23/23	Z. Denver	B310	Revise bar date motion.	0.50
02/23/23	Z. Denver	B230	Revise amended cash collateral order.	2.90
02/23/23	L. Pierre-Louis	B150	Review client document for answers to 341 questions	1.10
02/23/23	L. Pierre-Louis	B150	Conduct document review in Prep for 341 Meeting	0.00
02/23/23	L. Pierre-Louis	B150	Draft Answers to 341 Meeting Questions	2.40
02/23/23	R. Quigley	B160	Coordinate filing of retention application to employ LWHA.	0.70
02/23/23	R. Quigley	B190	Attend initial debtor interview call.	0.60
02/23/23	S. Stockman	B160	Revise time entries to ensure compliance with bankruptcy billing requirements.	2.20
02/23/23	S. Stockman	B160	Confer with Herrick team regarding fee applications.	0.60
02/23/23	L. Poretsky	B110	Search for and download new form of the monthly operating report per client request and circulate	0.70
02/23/23	L. Poretsky	B160	Follow up on a status of filing of LWHA employment application	0.20
02/23/23	L. Poretsky	B160	Review judge's procedure for submission of proposed amended orders	0.50
02/23/23	L. Poretsky	B160	Assemble, finalize and file LWHA employment application on presentment.	0.80
02/23/23	L. Poretsky	B160	Prepare for service filed LWHA Employment application (.6) and serve via e-mail and first class mail (.1)	0.70
02/24/23	J. Goldberg	B140	Revise draft stay stipulation and annexed document demand list.	0.50
02/24/23	J. Goldberg	B140	Confer by phone with A. Ravid re: status of stay stipulation and document requests to Weiss.	0.20
02/24/23	J. Goldberg	B140	Confer by phone with M. Friedman re: stay stipulation comments.	0.50
02/24/23	J. Goldberg	B140	Confer by phone with A. Ravid re: revisions to stay stipulation.	0.20
02/24/23	J. Goldberg	B160	Review HF invoices for fee application for work in state court litigation.	0.60
02/24/23	S. Selbst	B110	Attend telephone conference with Z Denver regarding questions of statements and schedules	0.50
02/24/23	S. Selbst	B160	Respond to S Stockman questions of prior Herrick fees	0.30
02/24/23	S. Selbst	B230	Discuss cash collateral stipulation and hearing with Z Denver	0.40
02/24/23	S. Selbst	B150	Respond to US Trustee questions regarding initial debtor interview	0.20
02/24/23	Z. Denver	B230	Draft email to Court re amended cash collateral order.	0.30
02/24/23	Z. Denver	B110	Revise statements and schedules with S. Selbst and D. Sasson assistance.	2.80



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
02/24/23	Z. Denver	B230	Prepare amended cash collateral order for service and notice.	0.60
02/24/23	Z. Denver	B160	Review/analyze invoices for fee application and retention application.	3.00
02/24/23	S. Stockman	B160	Continue to revise attachments to fee statement.	0.50
02/24/23	S. Stockman	B160	Revise attachments to fee statement.	0.80
02/24/23	S. Stockman	B160	Confer with C. Thornton regarding invoices for fee statement.	0.10
02/24/23	S. Stockman	B160	Confer with J. Goldberg regarding All Year retention application.	0.10
02/24/23	L. Schepp	B190	Revise, finalize and file Stipulation regarding removal.	1.10
02/27/23	S. Selbst	B110	Work with Z Denver on statements and schedules	0.70
02/27/23	S. Selbst	B160	Work with Z Denver on Herrick fee application	0.30
02/27/23	S. Selbst	B250	Conduct telephone conference with J Hubbard regarding sale strategy for William Vale Hotel	0.40
02/27/23	S. Selbst	B230	Discuss changes to cash collateral motion with Z Denver	0.30
02/27/23	S. Selbst	B110	Answer question from D Sasson regarding January MOR	0.20
02/27/23	S. Smith	B110	Review latest task list and related email correspondence.	0.20
02/27/23	Z. Denver	B230	Prepare mailing to Debtor's creditors re stipulation and revised cash collateral order.	0.20
02/27/23	Z. Denver	B110	Revise All Year task list.	0.70
02/27/23	Z. Denver	B110	Confer with clients re status of the case and upcoming hearings.	0.20
02/27/23	Z. Denver	B160	Confer with S. Stockman, A. Mehlman, and S. Selbst re fee application procedure.	0.40
02/27/23	Z. Denver	B110	Confer with client re monthly operating reports.	0.20
02/27/23	Z. Denver	B160	Review matter 3 bills for fee application.	1.20
02/27/23	Z. Denver	B150	Finalize/serve IDI Attachments on UST.	0.40
02/27/23	C. Halm	B190	Attend call with Z. Denver re Notice of Removal.	0.10
02/27/23	C. Halm	B190	Conduct follow-up research regarding effective date of removal and lastest updates in adversary proceeding.	1.30
02/27/23	S. Stockman	B160	Confer with Z. Denver regarding retention application and fee submission.	0.20
02/27/23	S. Stockman	B160	Review final invoice submission for fee statement.	0.30
02/27/23	S. Stockman	B160	Review invoices relating to retention application.	0.70
02/27/23	L. Poretsky	B160	Draft Affidavit of service LWHA Employment application by e-mail and first class mail and circulate for review	0.80
02/27/23	L. Poretsky	B110	Analyze docket and calendar deadlines and objections dates	0.40
02/27/23	L. Poretsky	B160	Revise, finalize and e-file affidavit of service of LWHA employment application	0.60



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
02/27/23	L. Poretsky	B110	Gather information required for the hearing registration.	0.40
02/27/23	L. Poretsky	B110	Register A. Mehlman, S. Selbst, J Goldberg, Z. Denver, Asaf Ravid and Ephraim Diamond for March 2nd Hearing	0.80
02/27/23	L. Schepp	B190	Update service list for stipulation regarding removal filings.	0.60
02/27/23	L. Schepp	B190	Arrange for service of stipulation regarding removal.	0.20
02/28/23	J. Goldberg	B140	Confer by phone with S. Selbst re: obtaining court approval for stay stipulation.	0.20
02/28/23	J. Goldberg	B140	Confer by phone with L. Poretsky re: contacting Chambers for guidance re: court approval of stay stipulation.	0.20
02/28/23	S. Selbst	B140	Discuss Weiss stipulation regarding stay with J Goldberg	0.30
02/28/23	S. Selbst	B110	Discuss statements and schedules with Z Denver	0.40
02/28/23	Z. Denver	B230	Prepare outline for cash collateral motion hearing.	3.10
02/28/23	Z. Denver	B140	Confer with R. Ansell (mechanic lienholder) re automatic stay application.	0.20
02/28/23	Z. Denver	B110	Review questions in statements and schedules.	0.90
02/28/23	Z. Denver	B110	Confer with S. Selbst re statements and schedules.	0.30
02/28/23	Z. Denver	B190	Review ADA Complaint and email to Wythe Berry team re follow ups on the same.	0.60
02/28/23	S. Stockman	B160	Revise invoices for October and November for compliance with court's requirements for fee submission.	2.20
02/28/23	L. Poretsky	B110	Confer with judge's law clerk regarding the options for the stipulation to be so ordered by judge and any additional steps needed.	0.40
02/28/23	L. Poretsky	B110	Conference with J. Goldberg regarding the options for presenting the stipulation to be so ordered by judge and any additional steps needed.	0.30
02/28/23	L. Poretsky	B110	Confirm team registration for March 2nd Hearing	0.40
03/01/23	S. Selbst	B110	Work with Z Denver on statements and schedules and notes.	1.10
03/01/23	S. Selbst	B230	Review outline for cash collateral hearing and provide comments to Z Denver.	0.40
03/01/23	S. Selbst	B190	Respond to J Goldberg re Schimenti litigation.	0.20
03/01/23	S. Selbst	B190	Respond to further queries from J Goldberg regarding Schimenti litigation.	0.40
03/01/23	Z. Denver	B110	Confer with D. Sasson re statements and schedules.	0.30
03/01/23	Z. Denver	B110	Draft email to clients re outstanding questions on the schedules.	0.10
03/01/23	Z. Denver	B160	Confer with S. Stockman re progress on fee application and data.	0.10



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
03/02/23	S. Selbst	B230	Participate in cash collateral hearing	0.50
03/02/23	S. Selbst	B110	Review comments and changes on statements and schedules.	0.40
03/02/23	S. Selbst	B110	Follow up with Z Denver regarding submission of orders to chambers	0.20
03/02/23	S. Selbst	B190	Telephone conferences with E Moskowitz and E Diamond regarding access to documents from Z Weiss	0.40
03/02/23	S. Selbst	B110	Review global notes to statements and schedules	0.40
03/02/23	S. Smith	B110	Review general notes to statements and schedules.	0.20
03/02/23	Z. Denver	B110	Prepare/finalize for filing schedules and statements and global notes.	2.20
03/02/23	Z. Denver	B230	Prepare for cash collateral hearing.	1.90
03/02/23	Z. Denver	B190	Review E. Moskowitz letter.	0.30
03/02/23	Z. Denver	B230	Participate in cash collateral motion hearing.	0.90
03/02/23	Z. Denver	B230	Confer with S. Selbst and L. Poretsky re cash collateral order.	0.30
03/02/23	Z. Denver	B230	Draft email to court re cash collateral order.	0.30
03/02/23	Z. Denver	B150	Revise section 341 meeting outline.	1.50
03/02/23	L. Pierre-Louis	B110	Revise 341 questions.	2.00
03/02/23	L. Poretsky	B160	Review docket for objection to LWHA retention application	0.20
03/02/23	L. Poretsky	B160	Prepare proposed final order authorizing LWHA retention in Word Format and exhibit to the proposed order.	0.40
03/02/23	L. Poretsky	B160	Draft, revise and finalize e-mail to Chambers submitting proposed order authorizing LWHA retention and underlining application to be presented for signature and submit to Judge Glenn	0.40
03/02/23	L. Poretsky	B110	Review final versions of the schedules, SOFA and declaration and request missing signature pages (.4), assemble same and circulate for review (.4).	0.80
03/02/23	L. Poretsky	B110	Prepare schedules, SOFA and Declaration for filing (.6) and e-file (.2).	0.80
03/02/23	L. Poretsky	B110	Review docket for recent notices of appearance (.5), update service list (.1).	0.60
03/02/23	L. Poretsky	B110	Cross-reference list of creditors and schedules to ensure all creditors included (.6), add additional creditors to the mailing list (.1)	0.70
03/02/23	L. Poretsky	B230	Draft e-mail to Chambers including proposed amended cash collateral order and circulate for review, redline and underling motion	0.40
03/02/23	L. Poretsky	B110	Prepare filed schedules, SOFA declaration for service (.7)	0.80



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
03/02/23	L. Poretsky	B110	and serve via first class mail on all parties (.1).	
03/02/23	L. Poretsky	B230	Prepare for e-service schedules, SOFA and declaration (.4) and serve accordingly (.1).	0.50
03/02/23	L. Poretsky	B110	Obtain copy of the court amended cash collateral order (.6) and serve via e-mail and first class mail (.1).	0.70
03/02/23	L. Poretsky	B110	Obtain copy of the so-ordered Stipulation, Agreement and Order Regarding Consent to Removal of Certain State Court Litigation (.5) and service via e-mail and first class mail (.1).	0.60
03/03/23	J. Goldberg	B310	Confer by phone with A. Ravid, E. Diamond, S. Selbst, Z. Denver re: next steps re: creditor meeting, bar date motion.	0.50
03/03/23	J. Goldberg	B190	Confer with R. Rosenberg re: Schimenti lawsuit against Wythe Berry Fee Owner LLC.	0.40
03/03/23	J. Goldberg	B190	Confer by phone with Z. Denver re: filing notice of removal on Schimenti lawsuit docket.	0.20
03/03/23	S. Selbst	B110	Conference call with clients re results of hearing and priorities for next week.	0.60
03/03/23	S. Selbst	B310	Work with Z Denver on revisions to bar date application.	1.10
03/03/23	S. Selbst	B190	Email E Moskowitz re request for information and read reply.	0.30
03/03/23	S. Selbst	B110	Work with Z Denver on amendment to schedules.	0.20
03/03/23	S. Smith	B110	Review schedules and L. Poretsky email re same.	0.30
03/03/23	S. Smith	B110	Analyze status of amended creditor matrix.	0.20
03/03/23	Z. Denver	B310	Revise Bar Date Application papers.	1.10
03/03/23	Z. Denver	B160	Revise retention application papers.	1.80
03/03/23	Z. Denver	B150	Review/revise 341 meeting outline and email to clients.	0.50
03/03/23	Z. Denver	B150	Review/analyze/revise Bar Date motion and associate questions.	3.70
03/03/23	Z. Denver	B230	Confer with client re cash collateral implications and next steps.	0.50
03/03/23	Z. Denver	B310	Call with S. Selbst re bar date motion questions.	0.20
03/03/23	Z. Denver	B110	Analyze Chapman concern re schedules and statements.	0.50
03/03/23	Z. Denver	B110	Coordinate filing of amended creditor matrix.	0.20
03/03/23	Z. Denver	B160	Draft email to Herrick team re retention application.	0.30
03/03/23	L. Pierre-Louis	B110	Revise Section 341(a) outline.	0.70
03/03/23	S. Stockman	B160	Continue to review fee statement for upcoming submission.	1.60
03/03/23	L. Poretsky	B110	Conference with court clerk who is overseeing this case to discuss previously filed creditor matrix and options to amend the creditor matrix and upload new creditors via	0.40



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<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
			case website	
03/03/23	L. Poretsky	B110	Draft amended creditors matrix and text file for uploading new creditors via case website and circulate for review (.8), e-file and upload same accordingly (.1).	0.90
03/03/23	L. Poretsky	B110	Draft, review and finalize affidavit of service of documents filed or entered on March 2, 2023 (1.1) and circulate for review and e-file (.2)	1.30
03/03/23	L. Poretsky	B110	Update service list	0.30
03/03/23	L. Poretsky	B310	Conference with judge's law clerk to discuss options re submission for bar date application either on presentment or without further notice per court procedural guidance for filing bar date motion and submit additional information and documents per request	0.60
03/03/23	L. Poretsky	B110	Analyze local rules and procedures related to the notice of presentment to determine notice requirements	0.40
03/03/23	L. Poretsky	B310	Analyze bankruptcy procedures, guidance for filing bar date motion, local rules and procedures related to the notice by publication and whether it is required in our case.	0.60
03/03/23	L. Poretsky	B110	Finalize amended creditor matrix and text file (.5) and e-file and upload same accordingly (.2).	0.70
03/03/23	L. Poretsky	B310	Draft, revise and finalize notice of presentment of bar date application (.7) and circulate for review (.1).	0.80
03/03/23	L. Schepp	B190	File certificate of service for stay stipulation.	0.20
03/06/23	S. Selbst	B110	Conference call with clients in preparation for 341 meeting	0.50
03/06/23	S. Selbst	B160	Review and comment on revised Herrick retention application	0.60
03/06/23	S. Selbst	B160	Review comments on Herrick time entries for fee application.	0.40
03/06/23	S. Selbst	B110	Discuss amendments to schedules and statements with Z Denver	0.20
03/06/23	S. Selbst	B310	Discuss bondholder comments on bar date application with Z Denver	0.30
03/06/23	S. Selbst	B150	Respond to question regarding adjournment of 341 meeting.	0.20
03/06/23	S. Selbst	B110	Read news coverage of Fee Owner Chapter 11 case	0.40
03/06/23	Z. Denver	B310	Revise Bar Date application.	0.20
03/06/23	Z. Denver	B110	Confer with clients re case administration issues.	0.30
03/06/23	Z. Denver	B110	Revise Fee Owner case task list.	0.70
03/06/23	Z. Denver	B160	Revise time entries for submission to the court.	0.70



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
03/06/23	Z. Denver	B310	Review/revise Bar Date Application	1.00
03/06/23	Z. Denver	B150	Confer with E. Diamond and A. Ravid re prep for 341 call.	0.50
03/06/23	Z. Denver	B110	Revise amended schedules.	0.40
03/06/23	C. Halm	B160	Review and revise certain time entries to prepare fee application.	0.40
03/06/23	L. Pierre-Louis	B110	Organize Debtor Binder ahead of 341 Meeting	1.10
03/06/23	S. Stockman	B160	Continue to review fee statement for upcoming submission.	2.30
03/06/23	L. Poretsky	B110	Analyze docket and claims register for filed appearances and claim and update service list accordingly	0.70
03/06/23	L. Poretsky	B310	Conference with Judge Glenn's law clerk regarding interpretation of the procedural guidelines for filing Bar Date Motion and submission of the proposed order and circulate finding to the team	0.40
03/06/23	L. Poretsky	B110	Prepare for filing, e-file and serve Amended Schedules	0.70
03/06/23	L. Poretsky	B310	Assemble, finalize and e-file Bar Date Motion and notice of presentment	0.90
03/06/23	L. Poretsky	B310	Update service list by e-mail and first class mail and serve Bar Date Motion on all parties.	0.80
03/06/23	L. Poretsky	B110	Submit payment for amended schedules	0.40
03/06/23	L. Poretsky	B150	Review trustee's 341 meeting instructions and circulate to the team	0.40
03/06/23	L. Poretsky	B110	Review Global Notes in connection with the amended schedules to determine if they covered amended schedules	0.30
03/07/23	S. Selbst	B150	Conference with Z Denver and US Trustee regarding adjournment of 341 meeting	0.30
03/07/23	S. Selbst	B150	E-mail client team regarding adjournment of 341	0.20
03/07/23	S. Selbst	B110	E-mail M Friedman regarding conference call regarding status	0.20
03/07/23	S. Selbst	B110	Work with Z Denver on preparation of January MOR	0.50
03/07/23	Z. Denver	B160	Confer with E. Diamond re retention application.	0.10
03/07/23	Z. Denver	B110	Draft email to D. Sasson re questions on January MOR.	0.30
03/07/23	Z. Denver	B160	Confer with court re LWH application status.	0.10
03/07/23	Z. Denver	B150	Confer with A. Schwartz re 341 meeting.	0.10
03/07/23	Z. Denver	B110	Finalize notice of adjournment of 341 meeting.	0.30
03/07/23	L. Pierre-Louis	B110	Revise contents of client binder for use at 341 meeting.	0.60
03/07/23	L. Pierre-Louis	B110	Continue to revise contents of client binder for use at 341 meeting (.6) and forward same to Z. Denver (.1).	0.70
03/07/23	R. Quigley	B190	Analyze press release published on Westlaw related to All Year.	0.20



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
03/07/23	L. Poretsky	B150	Draft notice of adjournment of meeting of creditors and circulate for review	0.70
03/07/23	L. Poretsky	B150	Revise, finalize and file notice of adjournment of meeting of creditors	0.60
03/07/23	L. Poretsky	B150	Review creditors list to ensure accuracy	0.20
03/07/23	L. Poretsky	B150	Prepare for service of notice of adjournment of creditors meeting (.5) and serve via e-mail where available and first class mail upon all parties (.1).	0.60
03/07/23	L. Poretsky	B310	Calendar presentment date and objection deadlines re bar date order	0.30
03/07/23	L. Poretsky	B110	Follow up with EXELA on status of bar date motion mailing	0.20
03/07/23	L. Poretsky	B150	Prepare for 341 meeting: download filed requested documents, assemble all requested documents and submit to L. Pierre-Louis for review.	0.70
03/08/23	S. Selbst	B110	Email article regarding Weiss to M Friedman and set up call	0.30
03/08/23	S. Selbst	B160	Discuss status of LWHA application with Z Denver	0.20
03/08/23	S. Selbst	B110	Review and approve changes to January MOR	0.30
03/08/23	S. Selbst	B230	Respond to client questions regarding interpretation of DIP order	0.30
03/08/23	Z. Denver	B160	Confer with Chapman team re Herrick retention application.	0.30
03/08/23	Z. Denver	B160	Confer with L. Poretsky re LWHA retention.	0.40
03/08/23	Z. Denver	B160	Confer with Herrick team re Herrick retention application.	0.50
03/08/23	Z. Denver	B160	Draft email to E. Diamond re payment history for Herrick retention.	0.40
03/08/23	L. Poretsky	B110	Draft, revise, finalize and e-file affidavit of service of documents filed on March 6, 2023	0.90
03/08/23	L. Poretsky	B150	Draft, revise, finalize and e-file affidavit of service of notice of adjournment of creditor meeting	0.70
03/08/23	L. Poretsky	B160	Conference with court clerk to discuss status of submitted proposed order to authorize employment of LWHA.	0.40
03/08/23	L. Poretsky	B160	Resubmit proposed order to authorize employment of LWHA and underlying motion to Chambers.	0.20
03/08/23	L. Poretsky	B110	Calendar upcoming hearing dates and circulate to the team	0.30
03/09/23	S. Selbst	B160	Work with Z Denver and LWHA on interim fee application	1.40
03/09/23	S. Selbst	B160	Final changes to Herrick 327(a) application and file same	0.40



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
03/09/23	S. Selbst	B110	Discuss MOR questions with Z Denver	0.40
03/09/23	S. Selbst	B160	Discuss need for monthly fee order with A Mehlman and Z Denver	0.40
03/09/23	Z. Denver	B160	Confer with LWHA team re fee application.	0.30
03/09/23	Z. Denver	B160	Call with S. Selbst re LWHA fee procedure.	0.20
03/09/23	Z. Denver	B160	Review case law re LWHA fee procedure and potential acceleration.	1.70
03/09/23	Z. Denver	B110	Review case filings and rules for paying support staff in the ordinary course.	0.80
03/09/23	Z. Denver	B110	Confer with S. Selbst re rules for paying support staff in the ordinary course.	0.20
03/09/23	Z. Denver	B160	Coordinate filing of Herrick retention application; notice of presentment timing.	0.90
03/09/23	Z. Denver	B110	Draft email to D. Sasson re MOR entries and how to address questions about the unsecured/secured debt distinction.	0.50
03/09/23	Z. Denver	B110	Review/analyze communications re case administration tasks.	0.20
03/09/23	L. Pierre-Louis	B110	Call with Z. Denver to discuss question on advance payment.	0.10
03/09/23	L. Pierre-Louis	B110	Review precedent on advancing payment of fees to professionals.	4.00
03/09/23	L. Pierre-Louis	B110	Draft Email to Z. Denver regarding research findings.	0.30
03/09/23	L. Poretsky	B160	Analyze bankruptcy rules and guidelines notice and objection provisions and circulate to the team	0.60
03/09/23	L. Poretsky	B160	Assemble, revise and finalize Herrick's retention application (1.0), prepare for filing and e-file Herrick's Retention application (.3)	1.30
03/09/23	L. Poretsky	B160	Review docket for recent appearances to confirm service list for retention application.	0.20
03/09/23	L. Poretsky	B160	Prepare filed Herrick retention application for service (.6) and serve via e-mail and first class upon all parties (.2)	0.80
03/10/23	J. Goldberg	B110	Confer by phone with M. Friedman, S. Selbst, Z. Denver re: status of Weiss stipulation compliance, and discussion re: plan.	0.50
03/10/23	S. Selbst	B110	Emails with Z Denver regarding comments on operating reports	0.40
03/10/23	S. Selbst	B190	Conference call with bondholder counsel regarding status and Weiss litigation	0.50
03/10/23	S. Selbst	B110	Work with Z Denver on amendment of schedules	0.20
03/10/23	S. Selbst	B230	Read Judge Glenn opinion on cash collateral	0.30



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
03/10/23	Z. Denver	B160	Draft/review motion to accelerate payment.	0.40
03/10/23	Z. Denver	B110	Draft/review affidavit re amended schedules.	0.60
03/10/23	Z. Denver	B110	Draft/review MOR Global Notes.	3.10
03/10/23	L. Pierre-Louis	B110	Draft Monthly Fee Application for Hospitality Advisor.	0.80
03/10/23	L. Pierre-Louis	B110	Revise and Format Sample Debtor Fee Application	0.60
03/10/23	L. Pierre-Louis	B110	Draft initial draft of LWHA's Monthly Fee Application.	3.10
03/10/23	L. Poretsky	B160	Search for form of motion establishing procedure for monthly compensation of professionals and circulate to the team	0.50
03/10/23	L. Poretsky	B110	Analyze local bankruptcy rules re filing of the notice of filing of amended schedules and/ or declaration in support	0.40
03/10/23	L. Poretsky	B110	Draft notice of filing of amended schedules and declaration in support and circulate for review	1.00
03/10/23	L. Poretsky	B110	Review changes to the declaration re filing of amended schedules, further revise and finalize, circulate for review	0.40
03/10/23	L. Poretsky	B160	Calendar presentment date of Herrick's retention application and objections	0.20
03/10/23	L. Poretsky	B110	Follow up and submit outstanding invoices for UCC search	0.30
03/12/23	L. Pierre-Louis	B110	Draft Supporting Application to Debtor's Motion.	3.50
03/12/23	L. Pierre-Louis	B110	Draft Monthly Procedures for Payment.	2.00
03/13/23	J. Goldberg	B110	Confer by phone with Z. Denver re: effect of payment pursuant to mortgage on amounts due under deed of trust.	0.20
03/13/23	J. Goldberg	B230	Review written decision issued by the Court approving Cash Collateral Order.	0.30
03/13/23	J. Goldberg	B230	Exchange email correspondence with E. Diamond re: written decision approving Cash Collateral Order.	0.20
03/13/23	S. Selbst	B110	Work on schedules amendments and January MOR with Z Denver.	1.30
03/13/23	S. Selbst	B230	Read Judge Glenn opinion on cash collateral.	0.40
03/13/23	Z. Denver	B230	Review opinion authorizing cash collateral.	0.80
03/13/23	Z. Denver	B110	Confer with UST re adjournment of Initial Case Conference.	0.40
03/13/23	Z. Denver	B110	Confer with L. Pierre-Louis, A. Mehlman, and S. Selbst re case administration issues.	0.40
03/13/23	Z. Denver	B110	Revise MOR Global Notes.	1.50
03/13/23	L. Pierre-Louis	B110	Revise Fee Application ahead of circulation to Z. Denver.	3.10
03/13/23	L. Pierre-Louis	B110	Revise Draft of Fee Motion and Proposed Order.	2.10



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
03/13/23	L. Pierre-Louis	B110	Call with Z. Denver to Discuss Draft Applications.	0.20
03/13/23	L. Pierre-Louis	B110	Incorporate Revisions to Draft Fee App.	0.40
03/13/23	S. Stockman	B160	Correspond with team regarding monthly fee statement submission.	0.30
03/13/23	L. Poretsky	B110	Revise, finalize and e-file Declaration Pursuant to S.D.N.Y. L.B.R. 1009-1	0.60
03/13/23	L. Poretsky	B110	Conference with Z. Denver re service of Declaration Pursuant to S.D.N.Y. L.B.R. 1009-1	0.20
03/14/23	S. Selbst	B160	Work with Z Denver on application for monthly fee order.	0.40
03/14/23	S. Selbst	B110	Review and comment on January and February MORs.	0.50
03/14/23	S. Selbst	B110	E-mail with counsel regarding adjournment of case conference.	0.30
03/14/23	S. Selbst	B190	Discuss status of Weiss document production with J Goldberg.	0.20
03/14/23	S. Selbst	B190	Review Weiss documents production.	0.90
03/14/23	S. Selbst	B150	Work with Chambers and US Trustee to reset case conference and 341 meeting.	0.40
03/14/23	S. Smith	B110	Review docket and current status.	0.30
03/14/23	Z. Denver	B110	Coordinate delivery of Weiss documents to Herrick team.	0.20
03/14/23	Z. Denver	B110	Revise Global Notes to MOR.	0.40
03/14/23	Z. Denver	B110	Confer with UST re Initial Case Conference.	0.30
03/14/23	Z. Denver	B160	Draft/review motion for monthly compensation and LWHA Application.	4.40
03/14/23	Z. Denver	B160	Draft email memo to S. Selbst re motion for monthly compensation.	0.30
03/14/23	L. Pierre-Louis	B110	Review and incorporate edits to fee application.	1.30
03/14/23	L. Pierre-Louis	B110	Call with Z. Denver to discuss revisions and comments to monthly compensation application.	0.80
03/14/23	L. Pierre-Louis	B110	Revise motion for LWHA's monthly compensation.	1.30
03/14/23	L. Pierre-Louis	B110	Revise application for monthly compensation order.	1.80
03/14/23	L. Pierre-Louis	B110	Further revise draft of motion for monthly compensation.	1.80
03/14/23	L. Pierre-Louis	B110	Further revise draft of proposed order for monthly compensation.	0.80
03/14/23	L. Poretsky	B160	Draft, revise, finalize affidavit of service of Herrick's retention application (.5) and circulate for review (.1)	0.60
03/14/23	L. Poretsky	B110	Contact courtroom deputy and e-mail Chambers to obtain adjournment date for initial case conference	0.30
03/14/23	L. Poretsky	B110	Draft notice of adjournment of initial case conference.	0.50



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
03/14/23	L. Poretsky	B160	Prepare affidavit of service of Herrick's retention application and e-file	0.30
03/15/23	J. Goldberg	B190	Analyze Weiss document production in preparation for call with Paul Hastings.	1.80
03/15/23	J. Goldberg	B190	Confer by zoom with N. Bassett, W. Farmer, Z. Denver re: status of Weiss document production pursuant to stipulation.	0.70
03/15/23	J. Goldberg	B190	Confer by phone with Z. Denver re: follow up tasks from meet and confer with Paul Hastings on status of Weiss document production.	0.30
03/15/23	S. Selbst	B110	Implement final revisions to MORs for January and February.	0.60
03/15/23	S. Selbst	B160	Discuss motion for monthly fee order with Z Denver.	0.20
03/15/23	S. Selbst	B160	Discuss LWHA fee application with Z Denver.	0.20
03/15/23	Z. Denver	B110	Confer with UST regarding notice of adjournment of initial case conference.	0.40
03/15/23	Z. Denver	B110	Revise notice of adjournment of initial case conference.	0.20
03/15/23	Z. Denver	B110	Coordinate/file final Global Notes and MORs for January and February 2023.	2.40
03/15/23	Z. Denver	B110	Review/analyze Weiss documents ahead of call with Paul Hastings.	1.00
03/15/23	Z. Denver	B110	Confer with J. Goldberg re Paul Hastings meet and confer.	0.20
03/15/23	Z. Denver	B110	Draft email memo to E. Diamond and A. Ravid re case status.	0.30
03/15/23	Z. Denver	B110	Confer with Paul Hastings re Weiss production gaps.	0.60
03/15/23	Z. Denver	B110	Confer with J. Goldberg re follow up on meet and confer with Paul Hastings.	0.10
03/15/23	Z. Denver	B110	Draft email memo to Paul Hastings re Weiss outstanding documents in response to Request 1.	0.90
03/15/23	Z. Denver	B110	Draft email memo to J. Goldberg re outstanding requests and Paul Hastings follow up.	0.50
03/15/23	R. Quigley	B110	Review monthly operating report filings.	0.30
03/15/23	S. Stockman	B160	Revise invoices for fee statement submission.	2.70
03/15/23	L. Poretsky	B110	Review e-mail from court re scheduling adjourned initial case conference, circulate to confirm available date and reply to confirm	0.40
03/15/23	L. Poretsky	B110	Revise notice of adjourned initial case conference (.4), circulate for review and prepare for e-filing (.2).	0.60
03/15/23	L. Poretsky	B110	Review e-mail from court re new dates for adjourned initial case conference, circulate to confirm available date.	0.20



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
03/15/23	L. Poretsky	B110	Revise notice of adjournment of initial case conference based on new proposed dates from Court, circulate to confirm available date.	0.30
03/15/23	L. Poretsky	B110	Revise and finalize Notice of Adjournment of Initial Case Conference and e-file	0.40
03/15/23	L. Poretsky	B110	Prepare Notice of Adjournment of Initial Case Conference and Declaration re Amended Schedules for service (.5) and serve via e-mail and first class mail (.2).	0.70
03/15/23	L. Poretsky	B110	Redact, assemble, revise and finalise January MOR (.4), and e-file (.4)	0.80
03/15/23	L. Poretsky	B110	Redact, assemble, revise and finalise February MOR (.4), and e-file (.3)	0.70
03/15/23	L. Poretsky	B110	Prepare January and February MORs for service (.4) and serve via e-mail and first class mail (.1).	0.50
03/16/23	J. Goldberg	B190	Revise draft chart tracking status of Weiss document production in response to Fee Owner requests pursuant to stipulation.	0.30
03/16/23	S. Selbst	B160	Discuss motion for monthly fee statements with Z Denver.	0.20
03/16/23	S. Selbst	B190	Receive update on status of Weiss document production from Z Denver.	0.30
03/16/23	Z. Denver	B110	Confer with Herrick IT re MOR problems.	0.30
03/16/23	Z. Denver	B160	Revise motion for establishing procedures for monthly compensation.	1.30
03/16/23	Z. Denver	B310	Review/analyze proof of claim by Alan Aguilar.	0.20
03/16/23	Z. Denver	B110	Revise affidavit of service.	0.20
03/16/23	Z. Denver	B190	Draft chart for Weiss document demands and outstanding issues.	1.60
03/16/23	Z. Denver	B310	Manage presentment of bar date order to the court.	0.40
03/16/23	Z. Denver	B160	Confer with S. Selbst and J. Goldberg re billing issues for fee statements.	0.20
03/16/23	S. Stockman	B160	Review invoices for February 2023 for compliance with bankruptcy billing guidelines.	1.70
03/16/23	L. Poretsky	B310	Revise proposed order establishing bar date (.3), prepare e-mail to Chambers re presentment of proposed order and submit to Chambers (.2).	0.50
03/16/23	L. Poretsky	B110	Draft, revise and finalize affidavit of service of documents served on March 15, 2023 ECF Nos 104, 107, 108 and 109 (.6) and circulate for review (.1).	0.70
03/16/23	L. Poretsky	B110	Review docket and update service list	0.30
03/16/23	L. Poretsky	B110	Revise affidavit of service, finalize and e-file	0.40
03/17/23	J. Goldberg	B190	Exchange email correspondence with D. Sasson re:	0.20



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
			Weiss document production status.	
03/17/23	S. Selbst	B160	Review and revise motion for interim payment of fees and expenses.	0.90
03/17/23	S. Selbst	B190	Discuss status of Weiss document review with Z Denver.	0.30
03/17/23	S. Selbst	B130	Discuss marketing of William Vale with J Hubbard (A&G Realty).	0.80
03/17/23	Z. Denver	B310	Manage bar date order and notice to creditors.	0.30
03/17/23	L. Pierre-Louis	B110	Incorporate revisions to draft fee application for Herrick's fees.	2.30
03/17/23	R. Quigley	B310	Analyze court order establishing deadline for filing proofs of claim.	0.30
03/17/23	L. Poretsky	B310	Phone call and e-mail to Judge Glenn Chambers re status of the Bar Date Order.	0.30
03/17/23	L. Poretsky	B310	Search for mailing addresses of government units referenced in Bar Date Order and update service list accordingly	0.60
03/17/23	L. Poretsky	B310	Review entered Bar Date Order for service instructions	0.20
03/17/23	L. Poretsky	B310	Prepare Bar Date Order for service and serve via e-mail and first class mail	0.80
03/17/23	L. Poretsky	B160	Confer with Z. Denver and D Sasson on March operating report.	0.70
03/17/23	L. Poretsky	B310	Review bankruptcy and local rules re service of bar date order to find out if the order should be served on creditors when they are represented by counsel who filed appearance in the case and conference with S. Smith	0.40
03/17/23	L. Schepp	B190	Update location of discovery and case files for attorney review.	0.60
03/20/23	S. Selbst	B160	Discuss LWHA request for emergency payment with Z Denver.	0.30
03/20/23	S. Selbst	B160	Attend conference call with LWHA regarding request for emergency relief.	0.40
03/20/23	S. Selbst	B160	Review and comment on revised motion for monthly fee payments.	0.30
03/20/23	S. Selbst	B150	Review revised materials for 341 meeting.	0.40
03/20/23	S. Selbst	B160	Review client comments and UST comments on monthly fee order.	0.20
03/20/23	Z. Denver	B160	Confer with LWHA team re motions for payment.	0.30
03/20/23	Z. Denver	B160	Confer with S. Stockman and L. Poretsky re fee applications versus monthly statements.	0.40
03/20/23	Z. Denver	B160	Revise motion establishing procedures for monthly compensation.	0.60



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
03/20/23	Z. Denver	B160	Draft email to LWHA re motion for monthly compensation.	0.20
03/20/23	Z. Denver	B110	Confer with S. Selbst re payment to taxing authority.	0.20
03/20/23	Z. Denver	B110	Review/revise affidavit of service for bar date notice.	0.20
03/20/23	Z. Denver	B160	Draft email to the US Attorney re monthly compensation procedures.	0.20
03/20/23	R. Quigley	B160	Review motion for establishing procedures for monthly compensation.	0.60
03/20/23	L. Poretsky	B160	Search and circulate forms of interim fee applications for review.	0.40
03/20/23	L. Poretsky	B310	Draft, revise and finalize affidavit of service of Bar Date Notice and circulate for review	0.80
03/20/23	L. Poretsky	B110	Update service list	0.30
03/20/23	L. Poretsky	B160	Confer with Z. Denver re filing Motion to Establish Monthly Payment Procedures on presentment	0.30
03/20/23	L. Poretsky	B160	Calculate presentment date and objection deadline and circulate for approval.	0.30
03/20/23	L. Poretsky	B160	Draft, revise and finalize notice of presentment of order on Motion to Establish Monthly Payment Procedures and circulate for review	0.60
03/21/23	S. Selbst	B240	Discuss Delaware franchise taxes with Z Denver.	0.20
03/21/23	S. Selbst	B130	Discuss marketing issues with J Hubbard.	0.40
03/21/23	S. Selbst	B150	Review prep materials for 341 meeting.	0.50
03/21/23	Z. Denver	B160	Draft email to US Trustee comparing motion for monthly payment and SDNY form.	1.50
03/21/23	Z. Denver	B110	Review files to prepare for 341 call.	0.40
03/21/23	Z. Denver	B160	Confer with L. Poretsky re filing monthly compensation motion.	0.40
03/21/23	L. Pierre-Louis	B110	Research supporting citations for monthly compensation procedures motion.	0.90
03/21/23	L. Pierre-Louis	B110	Review of Client Docket ahead of 341 Meeting.	0.20
03/21/23	L. Pierre-Louis	B110	Email to Z. Denver re: upcoming 341 meeting.	0.50
03/21/23	R. Quigley	B160	Review correspondence with U.S. Trustee's office regarding motion for establishing procedures for compensation.	0.20
03/21/23	L. Poretsky	B310	Revise and finalize affidavit of service of bar date notice and circulate for review	0.40
03/21/23	L. Poretsky	B310	Finalize affidavit of service of bar date notice for filing and e-file	0.40
03/21/23	L. Poretsky	B160	Revise, format and finalize notice of presentment and motion establishing compensation procedure and circulate for review	0.40



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
03/21/23	L. Poretsky	B160	Discuss with Z. Denver service of motion establishing compensation procedure and circulate for review (.5), obtain missing addresses and e-mails for the service (.1).	0.60
03/21/23	L. Poretsky	B110	Update service list	0.30
03/21/23	L. Poretsky	B160	Finalize notice of presentment and motion establishing compensation procedure for filing and e-file	0.70
03/21/23	L. Poretsky	B160	Prepare filed motion establishing compensation procedure for service and serve via e-mail and first class mail	0.80
03/22/23	S. Selbst	B150	Attend beginning of 341 meeting.	0.60
03/22/23	S. Selbst	B150	Attend telephone conference with Z Denver regarding adjourned date for 341.	0.20
03/22/23	S. Selbst	B110	Review new pleadings and docket.	0.30
03/22/23	Z. Denver	B110	Plan and prepare for 341 creditor call.	0.50
03/22/23	Z. Denver	B110	Attend planned 341 call.	0.40
03/22/23	Z. Denver	B110	Confer with parties re status of 341 call.	0.50
03/22/23	Z. Denver	B110	Draft notice of adjournment of 341 call.	0.20
03/22/23	L. Poretsky	B160	Draft, revise, finalize and e-file affidavit of service of motion to establish procedure for monthly compensation	0.90
03/22/23	L. Poretsky	B150	Finalize, e-file notice of adjourned meeting of creditors	0.40
03/22/23	L. Poretsky	B150	Serve notice of adjourned meeting of creditors via e-mail and first class mail	0.70
03/22/23	L. Poretsky	B110	Calendar deadlines and hearing dates for motions and adjourned meeting of creditors	0.40
03/22/23	L. Poretsky	B160	Draft first interim fee application	1.00
03/23/23	S. Selbst	B130	Discuss hotel marketing with C Romano.	0.40
03/23/23	S. Selbst	B190	Discuss status conference on adversary with Z Denver.	0.30
03/23/23	Z. Denver	B110	Confer with J. Goldberg, L. Poretsky, and S. Selbst re adjournment of pretrial conference.	0.40
03/23/23	L. Poretsky	B160	Gather information pertinent to Herrick's fee application	1.00
03/23/23	L. Poretsky	B110	Analyze adv. pro, docket and circulate Pre-Trial Conference registration deadline and review availability and possible adjournment,	0.50
03/23/23	L. Poretsky	B160	Draft Herrick's first interim fee application	2.70
03/24/23	L. Poretsky	B160	Draft first interim fee application	1.50
03/24/23	L. Poretsky	B160	Analyze information pertinent to the fee application (.4) and submit request to billing department for missing information (.1)	0.50
03/27/23	J. Goldberg	B190	Confer by phone with Z. Denver re: adjourning pre-trial conference for Fee Owner adversary proceeding.	0.20



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
03/27/23	J. Goldberg	B190	Exchange email correspondence with Ms. Anderson in Judge Glenn chambers re: adjourning pre-trial conference in Fee Owner adversary proceeding.	0.20
03/27/23	J. Goldberg	B190	Exchange email correspondence with J. Brooks and Y. Goldman re: adjourning pre-trial conference in Fee Owner adversary proceeding.	0.20
03/27/23	S. Selbst	B190	Discuss adjournment of adversary proceeding with Z Denver.	0.30
03/27/23	S. Selbst	B130	Discuss sale strategy with J Hubbard.	0.80
03/27/23	Z. Denver	B190	Confer with L. Poretsky and J. Goldberg re notice of adjournment.	0.60
03/27/23	Z. Denver	B190	Draft email request for adjournment.	0.40
03/27/23	Z. Denver	B190	Review/revise notice of adjournment.	0.20
03/27/23	Z. Denver	B230	Confer with D. Sasson re switching DIP accounts.	0.10
03/27/23	Z. Denver	B110	Call with S. Selbst re case status.	0.10
03/27/23	Z. Denver	B230	Review cash collateral order for restrictions on switching DIP accounts.	0.50
03/27/23	Z. Denver	B190	Confer with J. Brooks re adjournment date and time.	0.20
03/27/23	S. Stockman	B160	Analyze monthly fee statement submission.	0.40
03/27/23	S. Stockman	B160	Confer with accounting department regarding monthly fee statement submission.	0.20
03/27/23	S. Stockman	B190	Review alerts of adjournment of hearing deadline and confer internally regarding strategy.	0.20
03/27/23	L. Poretsky	B110	Draft, revise and finalize notice of adjourned pre-trial conference and circulate for review (1.0), update as to the date of conference, finalize and e-file (.3).	1.30
03/27/23	L. Poretsky	B110	Conference with Z. Denver re adjournment of pre-trial conference and missing filings in adversary proceeding	0.30
03/27/23	L. Poretsky	B110	Review adv. pro docket and circulate missing filings	0.20
03/27/23	L. Poretsky	B160	Review information received from billing department and attorneys' admission dates (1.2) and update first fee application (.4)	1.60
03/27/23	L. Poretsky	B110	Prepare for service notice of adjourned pre-trial conference (.6) and serve via e-mail and first class (.2).	0.80
03/27/23	L. Poretsky	B110	Compile service list re notice of adjourned pre-trial conference	0.30
03/28/23	S. Selbst	B160	Discuss timing of filing of fee applications and status of monthly payment order with Z Denver.	0.30
03/28/23	S. Selbst	B150	Review petition and schedules in preparation for 341 meeting.	0.60
03/28/23	S. Selbst	B130	Telephone conference with M Friedman regarding lender negotiations with Weiss.	0.40



<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
03/28/23	Z. Denver	B160	Confer with A. Mehlman re fee application.	0.10
03/28/23	Z. Denver	B150	Confer with clients re 341 call and initial case conference.	0.30
03/28/23	Z. Denver	B110	Confer with S. Selbst re case status.	0.20
03/28/23	S. Stockman	B160	Correspond with accounting department regarding monthly fee submission.	0.10
03/28/23	L. Poretsky	B150	Follow up on review of Affidavit of service of notice of adjourned creditor meeting, finalize and e-file	0.40
03/28/23	L. Poretsky	B160	Draft and revise first draft of the fee application (.7) and circulate for review (.1).	0.80
03/28/23	L. Poretsky	B110	Calendar pre-trial conference and registration deadline for adversary proceeding.	0.30
03/28/23	L. Schepp	B190	Update calendar notice for pre-trial conference.	0.20
03/29/23	J. Goldberg	B110	Confer by phone with S. Selbst to discuss status of current projects.	0.20
03/29/23	J. Goldberg	B110	Review and approve notice of adjournment of pre-trial conference in Fee Owner adversary proceeding.	0.20
03/29/23	S. Selbst	B110	Prepare for (.3) and attend 341 meeting of creditors (.7).	1.00
03/29/23	Z. Denver	B150	Attend 341 meeting of creditors.	0.70
03/29/23	L. Poretsky	B110	Draft, revise and finalize affidavit of service of Notice of Adjournment of Pre-Trial Conference in Adv. Pro. and circulate for review	0.70
03/29/23	L. Poretsky	B110	Finalize affidavit of service and e-file in Adv. Pro. Notice of Adjournment of Pre-Trial Conference	0.40
03/30/23	Z. Denver	B160	Confirm accuracy of Herrick retention order.	0.20
03/30/23	L. Poretsky	B160	Prepare proposed Herrick's retention order in Word for presentment	0.30
03/30/23	L. Poretsky	B160	Review docket to confirm no objections filed to application to retain Herrick	0.20
03/30/23	L. Poretsky	B160	Prepare and submit e-mail to Chambers with proposed Herrick's retention order in Word and underlying application	0.30
03/30/23	L. Poretsky	B160	Obtain copy of the entered Herrick's retention order and circulate to the team	0.20
03/31/23	S. Stockman	B160	Revise March time entries for compliance with bankruptcy billing guidelines.	1.00
				TOTAL \$853,265.50



HERRICK

All Year Holdings Limited
Attn: Asaf Ravid and Ephraim Diamond
12 Spencer Street, 3rd Fl.
Brooklyn, NY 11205

May 22, 2023
Invoice Number: 582687
Matter Number: 20772.0003
Tax ID: [REDACTED] 1662

Re: **WB Fee Owner Bankruptcy**

Fees for legal services rendered through April 30, 2023	\$49,631.50
Expenses posted through April 30, 2023	1,866.25
	TOTAL \$51,497.75
Unpaid balance from previous invoice(s)	\$289,623.50
Total Due Now	\$341,121.25

INVOICE PAYMENT IS DUE UPON RECEIPT. THANK YOU.

Please make checks payable to
Herrick, Feinstein LLP and mail to:
HERRICK, FEINSTEIN LLP
Mail Code: 11163
P.O. Box 70280
Philadelphia, PA 19176-0280

Send **wire or ACH payments** to:
Citibank, N.A.
ABA Number: [REDACTED] 0089
Account Number: [REDACTED] 6165
SWIFT #: [REDACTED] US33

*Must include invoice number in
comment field*

Credit card payments:
www.herrickpay.com
URL/link redirects to our
processor SlimCD

*Please note as of September 1, 2022
there will be a 2.45% surcharge on all
credit card payments.*

LEGAL SERVICES RENDERED:

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>ACTIVITY CODE</u>	<u>NARRATIVE</u>	<u>HOURS</u>
04/03/23	J. Goldberg	B110	A106	Confer by phone with A. Ravid re: strategy for chapter 11 plan and adversary proceeding.	0.20
04/04/23	J. Goldberg	B110	A106	Confer by phone with A. Mehlman, A. Ravid, E. Diamond re: strategy for chapter 11 and adversary proceeding.	0.70
04/04/23	A. Mehlman	B110	A106	Confer with J. Goldberg, A. Ravid, and E. Diamond re: strategy moving forward with chapter 11 and adversary proceeding.	0.80
04/05/23	J. Goldberg	B420	A105	Confer by phone with S. Selbst re: strategy for Fee Owner plan and adversary proceeding.	0.90
04/05/23	S. Selbst	B320	A105	Telephone conference with J Goldberg regarding negotiations with bondholders and Weiss regarding plan.	0.90
04/05/23	S. Selbst	B320	A104	Conduct analysis of reinstatement issue for plan relating to pre-petition defaults on mortgage and guaranty.	4.30
04/05/23	S. Selbst	B320	A108	E-mail E Diamond regarding All Year wind-down company.	0.20
04/05/23	M. Roe	B190	A105	Confer w/ S. Selbst re draft summary judgment papers.	0.20
04/07/23	S. Selbst	B160	A103	Work on first interim fee application.	0.90
04/10/23	S. Selbst	B320	A104	Analysis of applicable provisions of All Year plan for Wythe Berry.	1.80
04/11/23	S. Selbst	B320	A108	Telephone conference with bondholder counsel re plan of reorganization alternatives.	0.40
04/11/23	S. Selbst	B320	A103	Work on plan outline.	1.10
04/12/23	J. Goldberg	B190	A105	Confer by phone with M. Roe re: preparing default summary judgment motion for adversary proceeding.	0.10
04/12/23	J. Goldberg	B190	A105	Confer by phone with S. Selbst re: case planning and timelines.	0.20
04/12/23	S. Selbst	B160	A103	Work with Z Denver on final fee application.	0.40
04/12/23	S. Selbst	B320	A104	Conduct analysis of issues for confirmation and develop timeline for plan prosecution.	2.10
04/12/23	S. Selbst	B190	A104	Review and comment on lease summary judgment motion and affidavits.	1.10



HERRICK

All Year Holdings Limited
Attn: Asaf Ravid and Ephraim Diamond
12 Spencer Street, 3rd Fl.
Brooklyn, NY 11205

June 20, 2023
Invoice Number: 584752
Matter Number: 20772.0003
Tax ID: [REDACTED] 1662

Re: **WB Fee Owner Bankruptcy**

Fees for legal services rendered through May 31, 2023	\$66,852.00
Expenses posted through May 31, 2023	3,234.15
	TOTAL <u>\$70,086.15</u>
Unpaid balance from previous invoice(s)	\$286,179.40
Total Due Now	\$356,265.55

INVOICE PAYMENT IS DUE UPON RECEIPT. THANK YOU.

Please make checks payable to
Herrick, Feinstein LLP and mail to:
HERRICK, FEINSTEIN LLP
Mail Code: 11163
P.O. Box 70280
Philadelphia, PA 19176-0280

Send **wire or ACH payments** to:
Citibank, N.A.
ABA Number: 021000089
Account Number: [REDACTED] 6165
SWIFT #: [REDACTED] US33

*Must include invoice number in
comment field*

Credit card payments:
www.herrickpay.com
URL/link redirects to our
processor SlimCD

*Please note as of September 1, 2022
there will be a 2.45% surcharge on all
credit card payments.*



HERRICK

Invoice Number: 584752
Matter Number: 20772.0003
Page: 8

<u>DATE</u>	<u>NAME</u>	<u>TASK CODE</u>	<u>ACTIVITY CODE</u>	<u>NARRATIVE</u>	<u> HOURS</u>
05/18/23	J. Goldberg	B190	A108	arbitration.	
05/18/23	J. Goldberg	B190	A108	Confer by Zoom with client, Paul Hastings, Jon Brooks, Weiss, Chapman and Cutler and Bondholder Trustee representatives re: potential transaction and/or plan structure.	1.00
05/18/23	J. Goldberg	B190	A105	Confer with M. Roe re: projects for adversary proceeding.	0.30
05/18/23	J. Goldberg	B190	A103	Revise draft initial disclosures for adversary proceeding to incorporate client comments.	0.20
05/18/23	J. Goldberg	B190	A106	Confer by phone with E. Diamond re: comments to draft initial disclosures.	0.40
05/18/23	S. Selbst	B160	A104	Work on final fee application with Z. Denver.	0.00
05/18/23	S. Selbst	B320	A106	Conference call with clients regarding settlement call with Z. Weiss and all other parties.	0.90
05/18/23	S. Selbst	B320	A108	Conference call with all parties to discuss plan proposal and Goldman litigation.	1.00
05/18/23	S. Selbst	B190	A104	Review initial disclosures to be produced in lease litigation.	0.40
05/18/23	S. Selbst	B190	A104	Review Weiss initial disclosures in lease litigation.	0.30
05/18/23	M. Roe	B190	A105	Confer with J. Goldberg re discovery strategy.	0.30
05/19/23	J. Goldberg	B190	A105	Confer by phone with S. Selbst re: client direction concerning term sheet.	0.20
05/19/23	S. Selbst	B190	A105	Discuss initial disclosures of both sides in lease litigation with J Goldberg.	0.30
05/19/23	S. Selbst	B190	A104	Review Brooklyn Metro claims objection.	0.20
05/22/23	J. Goldberg	B190	A106	Confer by phone with S. Selbst, E. Diamond and A. Ravid re: negotiations with Weiss and projects for adversary proceeding.	0.40
05/22/23	S. Selbst	B320	A108	Conference call with A Ravid, E Diamond and J Goldberg regarding plan structure.	0.40
05/22/23	S. Selbst	B320	A108	Telephone conference with N Basset regarding Weiss offer.	0.20
05/22/23	S. Selbst	B110	A106	Email to client team regarding call with N Basset.	0.20
05/22/23	S. Smith	B120	A104	Review docket for referencing in commenting on proposed case timeline.	0.30
05/22/23	S. Smith	B120	A104	Review and comment on proposed case timeline.	0.30
05/22/23	S. Smith	B120	A105	T/C with S. Selbst re status of marketing and plan process.	0.30

Printing (080)		\$1.62
Printing (080)		\$0.18
Printing (080)		\$0.36
Printing (080)		\$0.72
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Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094454006; Date: 4/30/2023	\$2.28
Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094454006; Date: 4/30/2023	\$2.28
Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094454006; Date: 4/30/2023	\$2.28
Document Processing (105)	Vendor: Williams Lea Inc.; Invoice#: US004-180040556; Date: 4/28/2023	\$427.50
Document Processing (105)	Vendor: Williams Lea Inc.; Invoice#: US004-180040556; Date: 4/28/2023	\$57.00
Document Processing (105)	Vendor: Williams Lea Inc.; Invoice#: US004-180040556; Date: 4/28/2023	\$142.50
Document Processing (105)	Vendor: Williams Lea Inc.; Invoice#: US004-180040556; Date: 4/28/2023	\$71.25
Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094454006; Date: 4/30/2023	\$2.28
E-Discovery Data Hosting Minimum Charge (115)	All Year – Vale Hotel	\$100.00
E-Discovery Data Hosting Minimum Charge (115)	All Year Holdings Bankruptcy	\$100.00
E-Discovery Data Hosting per Gig Charge (116)		\$310.10
E-Discovery Data Hosting per Gig Charge (116)		\$12.20
Litigation Support Outsourced Services (025)	Vendor: CourtAlert.Com, Inc.; Invoice#: 310905-2304; Date: 4/30/2023	\$13.07
Litigation Support Outsourced Services (025)	Vendor: CourtAlert.Com, Inc.; Invoice#: 310905-2304; Date: 4/30/2023	\$13.07
Litigation Support Outsourced Services (025)	Vendor: E-Law, LLC; Invoice#: 377414; Date: 4/30/2023	\$3.21
Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 848241371; Date: 5/1/2023	\$25.64
Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 848241371; Date: 5/1/2023	\$512.70
Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 848241371; Date: 5/1/2023	\$144.87
Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 848241371; Date: 5/1/2023	\$204.49
Online research - West (075)	Vendor: West Group - GSI Payment Center-Westlaw; Invoice#: 848241371; Date: 5/1/2023	\$238.47
Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094492959; Date: 5/31/2023	\$0.00
Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094492959; Date: 5/31/2023	\$0.00
Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094492959; Date: 5/31/2023	\$0.00
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e-Copy (Scan) (067)		\$0.18
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Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094492959; Date: 5/31/2023	\$0.00
Color Duplicating (036)		\$258.00
Printing - blowback (089)		\$0.36
Shipping (013)	Vendor: Federal Express; Invoice#: 813055170; Date: 5/15/2023	\$14.81
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Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094492959; Date: 5/31/2023	\$0.00
Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094492959; Date: 5/31/2023	\$0.00
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Printing (080)		\$5.40
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Printing - blowback (089)		\$2.70
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Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094492959; Date: 5/31/2023	\$0.00
Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094492959; Date: 5/31/2023	\$0.00
Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094492959; Date: 5/31/2023	\$0.00
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Printing - blowback (089)		\$82.80
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Color Duplicating (036)		\$63.00
Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094492959; Date: 5/31/2023	\$0.00
Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094492959; Date: 5/31/2023	\$0.00
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Postage (001)		\$6.66
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Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094492959; Date: 5/31/2023	\$0.00
Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094492959; Date: 5/31/2023	\$0.00
Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094492959; Date: 5/31/2023	\$0.00
Printing - blowback (089)		\$34.02
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Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094492959; Date: 5/31/2023	\$0.00
E-Discovery Data Hosting Minimum Charge (115)	All Year – Vale Hotel	\$100.00
E-Discovery Data Hosting Minimum Charge (115)	All Year Holdings Bankruptcy	\$100.00
E-Discovery Data Hosting per Gig Charge (116)		\$310.10
E-Discovery Data Hosting per Gig Charge (116)		\$12.20
Postage (001)		\$0.00
Printing - blowback (089)		\$0.00
Online research - Lexis (073)	Vendor: Lexis/Nexis; Invoice#: 3094492959; Date: 5/31/2023	\$0.00